

# Due Diligence Report

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April 2025

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

Construction of Senior Living Home

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

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# ESG Due Diligence Report

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

Construction of Senior Living Home

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## 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 and 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>ESI</b>	Employee State Insurance		<b>PUC</b>	Pollution Under Control
<b>EWS</b>	Economically Weaker Sections		<b>RCC</b>	Reinforced Cement Concrete
<b>FSI</b>	Floor Space Index		<b>SPCB</b>	State Pollution Control Board
<b>HR</b>	Human Resources		<b>TIDCO</b>	Tamil Nadu Industrial Development Corporation
<b>HSE</b>	Health, Safety and Environment		<b>TNIFMC</b>	Tamil Nadu Infrastructure Fund Management Corporation Limited

## 1 INTRODUCTION

### 1.1 Background

1. 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.
2. 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.
3. TNSF is considering an investment in a “Senior Living Project” located in Pollachi, Tamil Nadu. As part of the investment process, TNIFMC has hired Colliers International, a sustainability and E&S services firm, to conduct the ESG due diligence for the proposed project.

### 1.2 Primary objective and Scope of Study

4. The objective of conducting the ESG due diligence is to assess the rate of 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

5. Assessment of Environmental, Social and Governance aspects of the project owner and proposed project against the applicable standards. The consultant will use the TNIFMC’s ESG policy, Asian Development Bank, World Bank, and International Finance Corporation (IFC) Performance Standards. The assessment will include but not limited to the following aspects:
  - Background check of project-owner/- on corporate governance including policies and incidents related to anti-bribery and anti-corruption, fraud, whistle-blower, diversity and inclusiveness, prevention of sexual harassment, child labour, forced labour, environmental health and safety policies, governance structure, regulatory compliances, incident against Key Management Personnel of the project owner/promoter/sponsor etc.
  - On-site investigation with respect to:
    - Past land use of the site and lease agreement review
    - Whether there are any disputes/claims/arbitration in any court of law pertaining to the land
    - Surrounding land use
    - Area geology, and potential soil and ground water contamination
    - Loss of biodiversity due to land clearing, waste disposal
    - Sources and availability of water (ground/surface),
    - Consumption of water
    - Impact on water availability for the local community in the area
    - Potential impact on soil and water bodies nearby
    - Effluents- type and quantity of effluents generated, are there any hazardous effluents generation, is there an effluent treatment plant, effluents (quality and quantity) and pollution prevention measures in line with local laws, standards, and regulations.

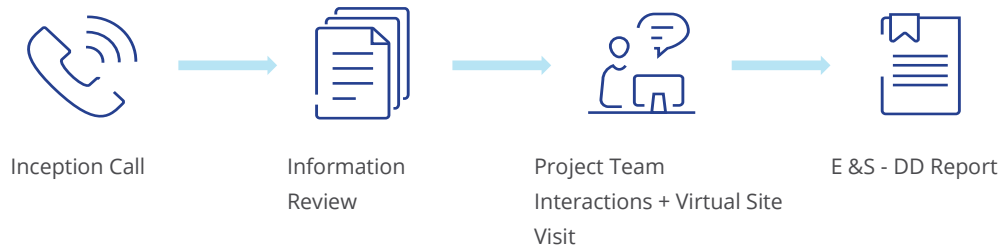
- Proximity to sensitive areas such as environmental, cultural and heritage site
- Adverse impact on air, water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity
- Loss of accessibility to the local community
- Past track record- have there been any serious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

6. 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 Guidelines

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

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



subsections.

### 1.5.1 Inception call

8. A call was conducted with the Company on 27.08.2023 with the following objectives:
- Obtain an overview of the project and status.
  - Explain the approach and methodology adopted for the E & S –DD.

### 1.5.2 Information review

9. 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 the project.

### 1.5.3 E&S Site Visit

10. E&S Site visit was conducted on 01.09.2023 at the Client project site with [REDACTED]. [REDACTED] Team interactions were held between 04.09.2023 to 26.09.2023 to corroborate the project details received through documents with the management and with the site team. [REDACTED].

### 1.5.4 Team Interaction

11. Assessment of the target company and project management was conducted through discussions with Mr. Chandra Natarajan on the following topics:
- Understanding the following aspects of project implementation:
    - EHS management measures adopted in the project.
    - E&S Legal Compliance management in the project
    - Organization structure at project level and entity level implementation of environmental and social aspects of the project.
    - Contractor management w.r.t fair wages, equal remuneration, inter-state migrant workers, building construction workers, contract labour etc.
  - Measures planned/undertaken on **environment, health and safety management** at the project site including safe work practices, waste management, training of workers, incident management, emergency preparedness and response, and local community grievance redressal.
  - Practices on **human resource management** including payment of wages, hours of work, leaves, worker grievance handling, procedures of prevention of sexual harassment for women workers, labour accommodation.
  - GHG emissions** sources and mitigation, water and energy conservation measures adopted.

## **1.6 Limitation of the Study**

12. 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.

## 2 PROJECT OVERVIEW

13. The Senior Living Project is a residential project to be developed by [REDACTED] in Periyaneagamam Village, Pollachi Taluk, Coimbatore District, Tamil Nadu. The project site bearing survey numbers 257/1B2B and 257/1C2. The project involves construction of housing facilities for senior living people with a Geriatric care facility, wellness center and all other necessary amenities. The total land area of the project is 2.42 acres, and the built-up area is 28,450 sq. ft. (2643 sq.m). The project is positioned geographically at 10.7390229 Latitude and 77.0874753 Longitude. At present, no construction activity is ongoing at the project site.

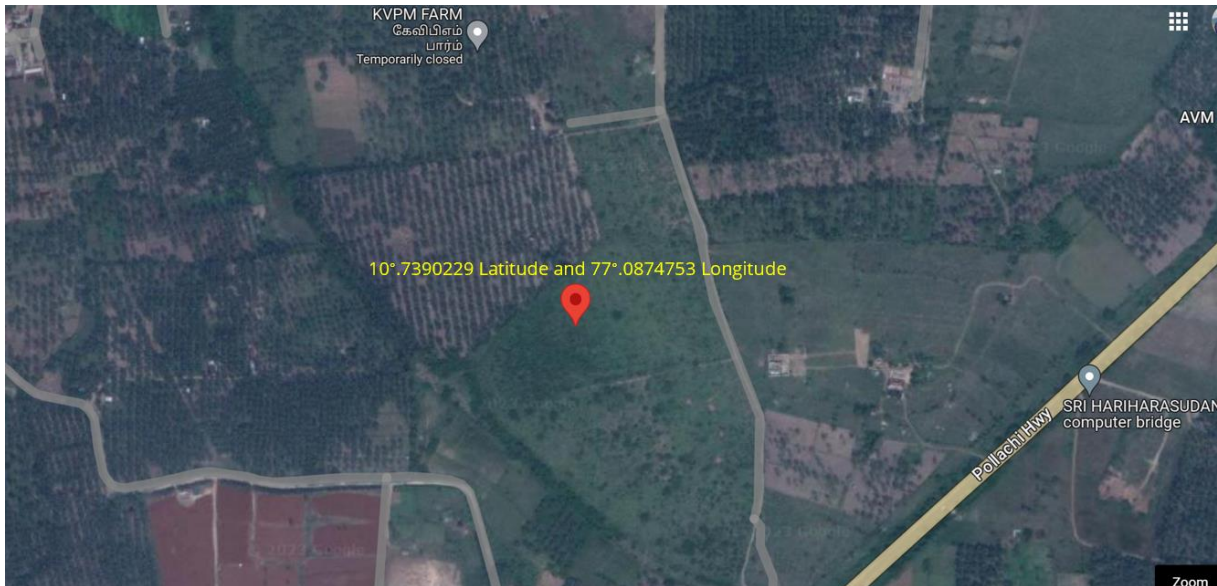
### State Pollution Control Board category of the project:

#### 2.1 Current Status of the Project

14. The project is currently doing the foundation laying work.

#### 2.2 Project Location, Connectivity and Land Use Land Cover

15. The Project is in Periyaneagamam village, Pollachi Taluk, Coimbatore District Tamil Nadu



**Figure 1 Project Location<sup>1</sup>**

#### 2.3 Land

16. The land is in the name of [REDACTED] (Refer to: Annex 5- Land documents are available with TNIFMC upon request).

[REDACTED] The land is classified as dry agricultural land as per revenue records. The land was vacant and unused. The due diligence confirms that project will not involve any voluntary/involuntary resettlement or displacement.

#### 2.4 Topography

17. 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.)

<sup>1</sup> <https://www.google.com/maps/place/10%C2%B044'20.5%22N+77%C2%B005'14.9%22E/@10.7390282,77.0849004,707m/data=!3m1!1e3!4m4!3m3!8m2!3d10.7390229!4d77.0874753!5m1!1e4?entry=ttu>

18. The topography of the project site is a flat plain land with a maximum elevation of 388m from mean sea level and a minimum elevation of 323m. The average elevation of the site will be 356m from mean sea level as shown in Figure 2.

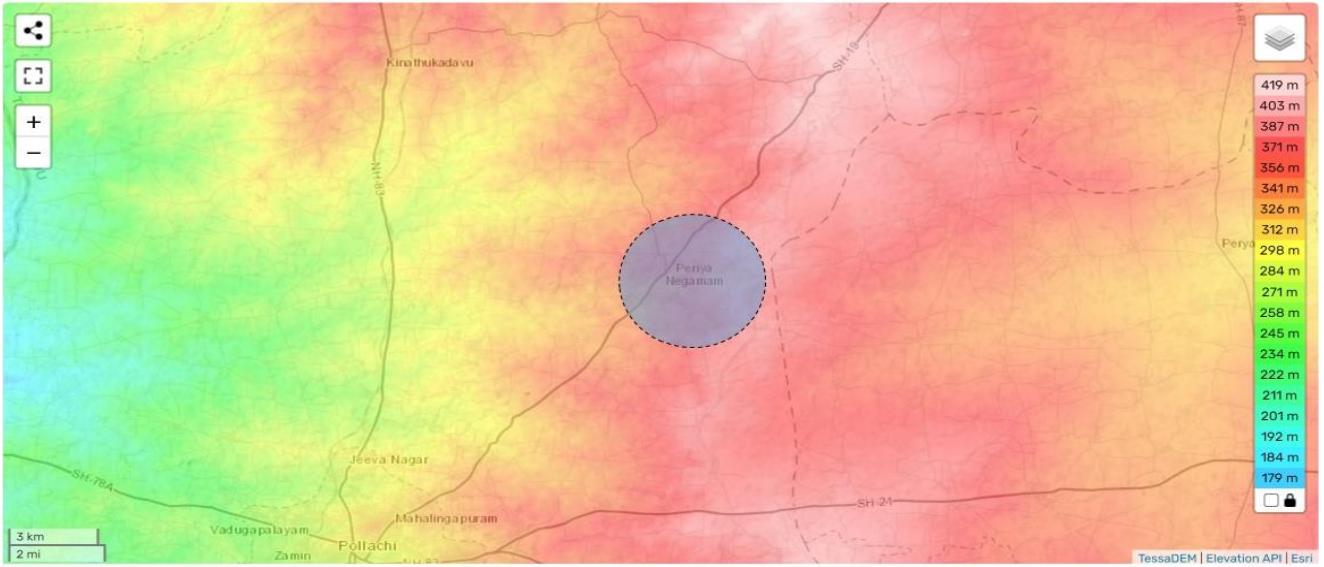


Figure 2: Topography<sup>2</sup>

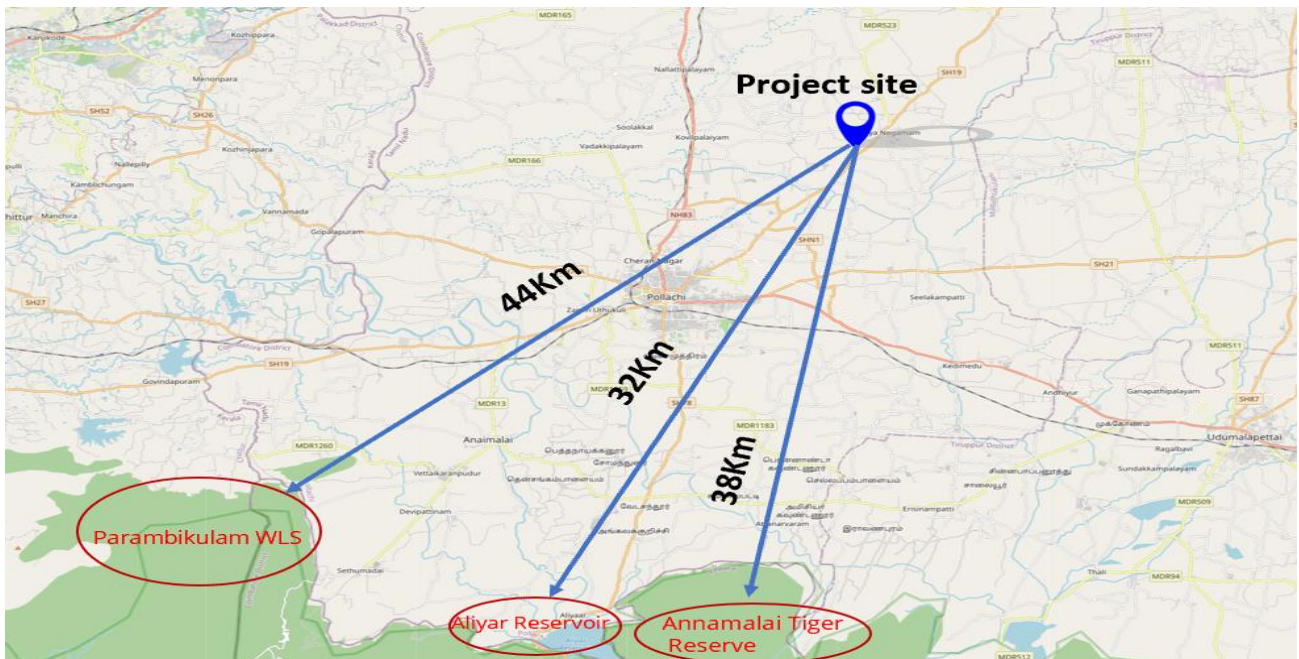


Figure 3: Natural Features

19. Figure 3 depicts natural features of the topographic map. The southernmost tip of the above topographic sheet shows Annamalai tiger reserve which is 38km. away from the project site and Parambikulam wildlife sanctuary which is 44Kkm. away from the site. The project site will not create any impact on these protected areas. The area around the site has presence of permanent

<sup>2</sup> (<https://en-in.topographic-map.com/map-ncm9m/Periya-Negamam/?center=10.80565%2C76.51291&overlay=0&base=2&zoom=10> )

water bodies such as Aliyar Reservoir (located 32Km from the project site), and Parambikulam Reservoir (located 51.37km from the project site).

## 2.5 Connectivity

**Table 1: Connectivity to the project site**

S. No.	Site location from key focal nodes	Observation
1.	Project Borders	Periyane-gamam village is surrounded in the East by Chinnanegamam village panchayat, West by Vaguthampalayam village panchayat, North Kapalakarai village panchayat South by Gondegoundenpalayam village panchayat
2.	Highway/ Access Road	The project site is connected to NH-83 within 448m and panchayat roads within 150m.
3.	Railway Station	Nearest Railway Station -Pollachi Junction, Railway Station Rd, Periyapodhu, Pollachi, Tamil Nadu 642001 (15Km)
4.	Bus station	Nearest bus station is Pollachi bus stand which is 15Km away from project area.
5.	Airport	The nearest airport to Pollachi is Coimbatore (CJB) Airport which is 41.6 km away from project site.

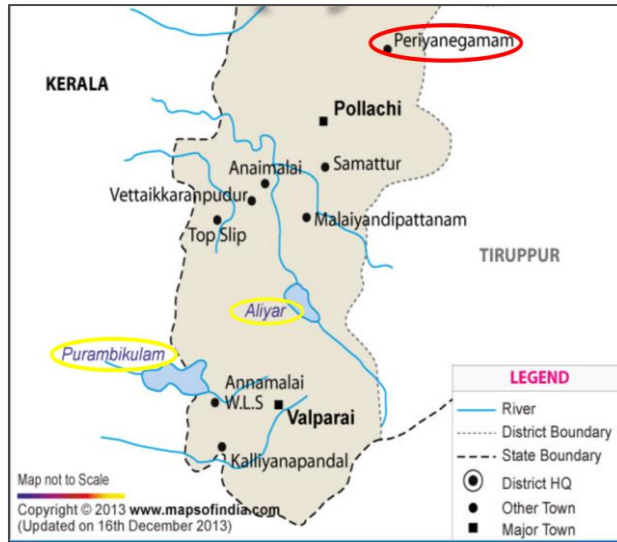
## 2.6 Social Infrastructure

**Table 2: Social Infrastructure**

<b>Schools</b>	<ul style="list-style-type: none"> <li>Government Higher Secondary School, Periya Negamam (including an NSS unit). -1.41Km</li> <li>Government Girl's High School, Periya Negamam – 1.56 Km</li> <li>Sri Vigneshwara Vidhyala School, Periya Negamam – 1.54Km</li> <li>Pollachi institute of technology at Avalappam Patti-8.05Km</li> </ul>
<b>Health facilities</b>	<ul style="list-style-type: none"> <li>Shree Hospital Negamam Sinthuluppu road within 1.48Km.</li> <li>Government Head Quarters Hospital, NH 209, Palaghat Rd, Palaghat, Pollachi is 12.35 Km away from site.</li> <li>Pranave Clinic, DMG Nagar, Pollachi is 15.21 Km away from the site.</li> <li>Rajam Medical centre and Hospital, Pollachi- 26.04Km</li> </ul>
<b>Colleges</b>	<ul style="list-style-type: none"> <li>Arjun College of Technology- 3.60Km</li> <li>PA College of Education- 9.8Km</li> <li>Nallamuthu Gounder Mahalingam College-15.2Km</li> </ul>
<b>Police station</b>	<ul style="list-style-type: none"> <li>Periya Negmam Police Station-2.1Km</li> </ul>

## 2.7 Hydrology

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

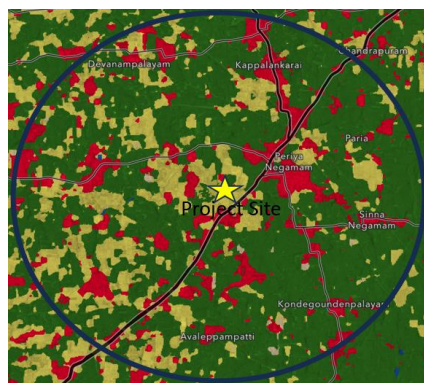


**Figure 4: River basins Tamil Nadu <sup>3</sup>**

21. Figure 4 shows the number of major river basins in the State of Tamil Nadu. As depicted in the map the river basin flowing through the Coimbatore region is Parambikulam Aliyar basin.
22. Figure 5 depicts the flow of Aliyar River and Parambikulam river near Pollachi. The project site is well connected with Parambikulam Aliyar Irrigation Project (PAP) and Aliyar Water scheme. Nearby river to the project site is Ambarapalayam river (25km. from the project site) which is the sub tributary of Aliyar River. PAP is used for promoting irrigation and power generation in Coimbatore and Erode district, weirs, dams, reservoirs, tunnels, open channels, and contour - canal have been constructed.

**2.8 Land Use and Land Cover**

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



**Figure 5: Land Cover <sup>4</sup>**

<sup>3</sup> <https://www.mapsofindia.com/maps/tamilnadu/river->

<sup>4</sup> ESRI-Sentinel 2 Land cover

24. The land use of the current project site is fallow and open barren land with no structures present. The below figure provides the land use of the area outside the project site upto a 5km radius. The maximum area outside the project site is occupied by trees which sums up to 58% and shrubs and weeds cover by 24%, the remaining area covered by residential and commercial buildings is 18%. The construction of the project will have no impact on these areas as these are outside the project site and vice versa. Due diligence confirms the same.

### 3 KEY FINDINGS SECTION

#### 3.1 ESG Risk Rating Tool

ESG Risk Rating Tool - TNSF (Version 1.0)			
Project Details			
Name of the Project	Senior Living	Start of Evaluation Date	
Site Location / Alternatives under consideration	Pollachi, Coimbatore	Project Developer	Kaivalyam Eco Life Private Limited
Total Project Cost (in INR Million)		TNSF Investment (in INR Mill)	
		Investment Period	

Dimension	No. of Observations
<b>List of ESG Issues</b>	<b>6</b>
Environment	4
Social	2
Governance	0
<b>Material ESG Risks</b>	<b>6</b>
Environment	4
Social	2
Governance	0

Project Risk Rating	
Risk Level (%)	ESG Risk Rating
<b>43.0556</b>	

Sl. No.	Dimension	Risk Score
1	Environment	19.00
2	Social	12.00
3	Governance	0.00

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

**Note to the user**

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.

25. 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.
26. The issues identified are based on the current project status and may evolve during construction and operational phase. The overall risk rating is 43.056% 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>	19
<b>Social</b>	12
<b>Governance</b>	0

The material risks identified from the tool includes the following.

<b>Environmental</b>	<ul style="list-style-type: none"> <li>Development of E&amp;S Policy</li> <li>Development of Environmental and Social Management System</li> <li>Extraction of groundwater</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>Grievance Redressal Mechanism</li> <li>Stakeholder engagement</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>-</li> </ul>

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

#### Method of Assessing Compliance

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

- The regulations and their applicable requirements are listed in the first and second columns, respectively.
- The compliance of projects with legal requirements has been indicated based on the legend given below.

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

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

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

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

**No Info** **INSUFFICIENT INFORMATION** to assess the status of compliance/conformance

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

### 3.3 Legal Requirements- Environmental

**Table 3: Legal Requirements-Environment**

Legal Requirements- Environment							
SI.NO	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
1	Environmental Impact Assessment Notification 2006 and amendments thereof	Not Applicable. The proposed project encompasses 2.4-acre parcel land with a total built-up area of 2,697.43 sqm. The total built-up area of the project is less than 20,000 sqm which is considered the threshold limit of built-up area to be eligible for environmental clearance.	Obtain Environmental Clearance (EC) under the EIA Notification 2006	Tamil Nadu Environmental Impact Assessment	An environmental clearance is not required for the proposed project as the total built-up area of the project is 2,697.43 sqm which is less than 20,000 sqm which is considered as the threshold limit of built-up area to be eligible for EC.	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) and Water	Applicable. All potential pollution activities will require	Consent to Establish Certificate (CTE) u/s 21 of Air Act and u/s 25 of Water Act	Tamil Nadu Pollution Control Board	At present no construction activity has commenced at the project site. The	NA	Recommend the developer to ensure that no construction activity is commenced at the

Legal Requirements- Environment							
SI.NO	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	Prevention and Control of Pollution Act, 1974 (Water Act)	Consent to Establish from Pollution Control Board before commencing construction activity at the proposed project site.	Comply with the conditions of CTE		<p>developer is yet to apply for the CTE certificate.</p> <p>Compliance to CTE conditions which includes but not limited to- treatment of domestic effluents (conditions under Water Act), diesel generators (conditions under Air Act), sewage disposal &amp; waste facility, ambient air, water and noise standards and labor camps.</p>	NA	<p>project site without obtaining CTE certificate.</p> <p>Recommend the developer to comply with the CTE conditions during the construction phase of the project.</p>
3	Air Prevention and Control of Pollution Act, 1981 and Water Prevention and Control of Pollution Act, 1974	Not Applicable to the present stage of the proposed project site.	Consent to Operate (CTO)		A CTO certificate is required to be obtained before commissioning of the proposed project. At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	Recommended to obtain CTO before commissioning the project.
4	Environment Protection Second Amendment Rules 2002 (DG set) & 2004	Not Applicable because the project is not utilizing DG sets for emergency power supply.	The stack height of the DG should be as per the regulations. DG set should be housed in an acoustic enclosure	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Based on the E&S site visit observations, the project site does not utilize DG sets for	NA	Recommend ensuring compliance with DG set rules.

Legal Requirements- Environment							
SI.NO	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
					emergency power supply.		
5	Noise Pollution (Regulation and Control) Rules, 2000	Not Applicable to the present stage of project operation.	No horn shall be used in silence zones or during nighttime (u/r 5A (1)) Sound emitting construction equipment shall not be used or operated during night-time in residential areas and in silence zones. (u/r 5A (2))	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Hence, not applicable	NA	Recommend the developer to conduct ambient noise monitoring report. It is further recommended that the developer should take adequate measures to control noise levels and restrict to 55 dB(A) during daytime and 45dB(A) during night-time 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	Not Applicable	Occupier shall be responsible for safe and environmentally sound management	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no presence of 'hazardous waste' as defined under section	NA	None.

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

Legal Requirements- Environment							
SI.NO	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
			direction or notification by the local authorities from time to time. u/r 4(a)				
10	E-Waste (Management) Rules, 2016	Not applicable to the present stage of the project operations	Ensure e-waste generated by them is channelized through collection center or dealer of authorized producer or dismantler or recycler or through the designated take back service provider of the producer to authorized dismantler or recycler. u/r 9(1) Maintain records of E-Waste generated in Form-2. u/r 9(2)	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no e-waste present at the proposed project site.	NA	None.
11	Central Ground Water Authority Guidelines to regulate and control Ground Water Extraction in India dated 1 June 2019 Groundwater (Development and	Not Applicable to the present stage of the project operation.	Registration of existing borewells/NOC for new borewells.	Central Groundwater Authority	Based on the E&S site observations there are no borewells present at the proposed project site.	NA	Going forward recommends obtaining borewell approval if installed at the project site.
			Installation of digital water flow meter (confirming to BIS standard) in the abstraction structure (s)		Not applicable.	NA	

Legal Requirements- Environment							
SI.NO	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	Management) Act, 2009						
12	Tree Cutting and Replantation NOC scheme	Requirement for tree cutting for construction works to commence at Project site.	Permission is required for cutting/transplanting trees coming in proposed construction of high-rise residential building	Tree Authority	Based on the E&S site visit observations, there are no trees present at the proposed project site. Hence, not applicable.	NA	None.

### 3.4 Insurances

**Table 4: Project Insurance**

### 3.5 Legal Requirements- Occupational Health & Safety

Project Insurances					
Sl. No	Applicable Insurances	Observations	Compliance Status	Recommendations	
1	General Insurance for the property	The general insurance of the project was not shared for review.	NC	Recommend the developer to obtain general insurance for the property.	
2	Contractor All Risk Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Recommend the developer to obtain contractor all risk policy when construction activity commences at the project site.	
3	Third Party Liability Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Recommend the developer to obtain contractor all risk policy when construction activity commences at the project site.	
4	Environmental Liability insurance	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Recommend the developer to obtain contractor all risk policy when construction activity commences at the project site.	



Legal Requirements- Occupational Health & Safety						
Sl. No	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
			<ul style="list-style-type: none"> <li>Lifting appliances and gear (Chapter VII)- testing, safe, load indicators, ropes</li> <li>Reporting of accidents (u/r 237)</li> <li>Medical examination of crane operators, exposure to special occupational hazard (u/r 250)</li> <li>Safety Officer (u/s 38 &amp; u/r 209)</li> <li>Health and Safety Policy (u/r 39)</li> </ul>		NA	
2	Central Electricity Authority (Measures relating to safe and Electric Supply) Regulations, 2010		<p>General safety requirements for:</p> <ul style="list-style-type: none"> <li>Electric Supply lines and apparatus safety</li> <li>Cut-out</li> <li>Earthed terminal</li> <li>Dangerous notice</li> <li>Flexible cables</li> </ul> <p>Fire buckets filled with clean dry sand and ready for immediate use for extinguishing fires, in addition to fire</p>			

Legal Requirements- Occupational Health & Safety						
Sl. No	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
			extinguishers suitable for dealing with electric fires shall be kept at site			
3	Gas Cylinder Rules 2016	Not applicable. No gas cylinders are present at the project site.	Specifications for labelling (u/s 9) and storage (u/s 21) of gas cylinders (vertically in a cool, dry, well-ventilated place under cover away from heat)	There are no gas cylinders present at the project site.	NA	None.

### 3.6 Legal Requirements- Labour and Working Conditions

**Table 6: Labour and Working Conditions**

Legal Requirements- Labour and Working Conditions						
Sl. 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 ongoing at the project site. Hence, not applicable.	a. Registration of Establishment as principal employer (u/s 7)	At present there is no construction work ongoing at the project site. There are no labourers deployed at the project site. Hence, not applicable to the present stage of project operations.	NA	Recommend obtaining and complying once construction activities commence at the project site.
			b. Contractor's license for workers more than 50 (u/s 12)			
2	Minimum Wages Act, 1948		Payment of minimum wages as per latest circular. u/s 5&12			
3	Employee Compensation Act, 1923 and Amendment Act, 2009		Obtaining insurance policy for the same. u/s 4(2)			
4	Employees' Provident Funds		Deduction of employee contribution and deposit of			

Legal Requirements- Labour and Working Conditions						
Sl. No	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
	(EPF) and Miscellaneous Provisions Act, 1952 amended up to 1996's.		employee and employer contribution with the authority. u/s 6			
5	Employees' State Insurance Act (ESI), 1948		Deduction of employee contribution and deposit of employee and employer contribution with the ESI Corporation. u/s 40(1)			
6	Equal Remuneration Act, 1976		Duty of employer to pay equal remuneration to men and women for same work or work of similar nature (u/s 5)			
7	Inter-State Migrant Workers Act 1979		a) Registration of establishment as principal employer (u/s 4)			
			b) Contractor's license for engaging migrant workers (u/s 8)			
			c) Payment of wages as per Minimum Wages Act (u/s13)			
			d) Displacement allowance equal to fifty percent of the monthly wages (u/s 14)			
			e) Journey allowance (to and from hometown payable by Contractor (u/s 15)			

Legal Requirements- Labour and Working Conditions						
Sl. No	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
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)	It is a two-member company. Hence, not applicable.	NA	None.
9	Maternity Benefit	Maternity Benefit Act, 1961	Maternity benefit leaves of 26 weeks (u/s 5(3))	It is a two-member company hence, not applicable.	NA	None.
10	Child Labour	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development	At present no construction has commenced at the project site. Based on the E&S site visit observations there are no child laborer's present at the project site.	C	Recommend the developer to ensure that there are no child laborers present at the project site during the construction phase.

## 3.7 Assessment of IFC PS 1

Table 7: Assessment and Management of E&amp;S Risks and Impacts

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Policy	Applicable. The construction activities at the proposed project site give rise to environmental and/or social risks and impacts.	IFC PS1	<p>a. Establishing E &amp; S Policy which incorporates national laws</p> <p>b. Policy to indicate competent professionals to ensure conformance &amp; execution of the Policy</p> <p>c. Communication of the policy to all levels of organization</p>	Environmental and social policy was not shared for review.	NC	Recommend the developer to formulate an environment and social policy at the entity level. The policy should indicate the designated individual from the developer's team will confirm and execute the policy. The policy should be communicated to all stakeholders.
2	Identification of risks & impacts	Not applicable as the project built-up area is less than the required threshold for conducting EIA.		<p>a. Conducting an environmental and social impact assessment. (ESIA or EIA) of the project, appropriate to the nature of the project's environment and social risks</p> <p>b. ESIA should consider baseline environmental and</p>	<p>The proposed project encompasses 2.4-acre parcel land with a total built-up area of 2,697.43 sqm. The total built-up area of the project is less than 20,000 sqm which is considered the threshold limit of built-up area to be eligible for environmental clearance. An EIA is a pre-requisite for EC. Hence, not applicable.</p> <p>EIA document considered baseline</p>	<p>NA</p> <p>NA</p>	<p>None</p> <p>None.</p>

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				social data (for instance CO2 emission, air & water pollution)	environmental and social-economic data		
3	Monitoring and review	Applicable. The construction activities at the proposed project site gives rise to environmental and/or social risks and impacts.		<p>a. Establish procedures to monitor and measure the effectiveness of the management program</p> <p>b. Senior management in the client organization will receive periodic performance reviews of the effectiveness of ESMS</p>	<p>An environmental and social management system was not shared for review.</p> <p>No information pertaining to review of ESMS by the senior management was shared for review.</p>	NC	Recommend the developer to establish procedures to monitor the effectiveness of the ESMS. The ESMS should be reviewed periodically by the senior management of the developer's team.
4	Emergency preparedness and response			<p>Establish and maintain emergency preparedness response system to respond to accidental and emergency situations associated with the project.</p> <p>-- identification of areas where accidents and emergency situations may occur</p> <p>-- impacted communities &amp; individuals</p> <p>-- response procedure</p> <p>-- procedure of equipment &amp; resource</p> <p>-- designation of responsibilities</p>	An emergency preparedness and response system were not shared for Review.	NC	Going forward recommend the developer to formulate emergency measures and procedures. The project site should identify accidental areas and keep safety signages. All labourers should be equipped with PPE kits, safety boots etc. Developer to ensure a Safety Engineer is deployed at the project site during the construction stage of the project.

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				-- communication with potentially affected communities			
5	Stakeholder engagement			Developing a stakeholder engagement plan	A stakeholder engagement plan was not shared for review.	NC	Recommend the developer to develop stakeholder engagement plan which includes effective participation of disadvantaged or vulnerable, resources and responsibilities and monitoring and reporting.
6	External communication and grievance mechanism			Implement and maintain procedures for external communications: -- receive and register external communication from public -- screen, assess and determine issues -- proven track and document responses	The project site does not have procedures for receiving, implementing, and maintaining external communication with both internal and external stakeholders. There is no grievance redressal policy available at entity level.	NC	Going forward it is recommended to formulate and implement a grievance redressal procedure at project site which should include the following: -Designate roles and responsibilities at the project level. -Maintaining procedures for reporting of grievance complaints -Set time for addressing grievance and escalation
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 project does not identify any affected communities.	NA	Going forward, it is recommended to establish a grievance mechanism as a good practice

## 3.8 Assessment of IFC PS 2

Table 8: IFC PS 2

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Human Resources Policies and Procedures	Applicable. The project employs laborers at site for construction works and entity level also there are employees.	IFC Performance Standard 2	<ul style="list-style-type: none"> <li>a. Anti-bribery and Anti-corruption</li> <li>b. Code of Ethics and Conduct</li> <li>c. Whistle Blowers Policy</li> <li>d. Grievance Policy</li> <li>e. Prevention of Sexual Harassment Policy</li> <li>f. Equal Employment Opportunity</li> <li>g. Leave Policy</li> </ul>	At present it is a two-member company. Human resources policies and procedure are not applicable to the present stage. Anti-bribery and anti-corruption policy was not shared for review.	NA	Going forward recommends as a good practice to formulate and implement human resources policies and procedures.
2	Working conditions and terms of employment			<ul style="list-style-type: none"> <li>a. Communication of documented information regarding their rights under national labor and employment law</li> <li>b. Workers right to form and join workers organization the client shall respecting collective bargaining agreements</li> </ul>	Provision of collective bargaining agreement is not applicable for the current E & S due diligence assessment as it is not an industrial project.	C	None.
						NA	None.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				c. Base the employment relationship on the principle on non-discrimination and equal employment opportunity	At present it is a two-member company. The Company does not have a policy on non-discrimination and equal employment opportunity. Contract agreements with equal employment clause not shared for review.	NA	Recommend developer to ensure employment to be based on the principle of non-discrimination and equal employment opportunity
				d. Procedure for addressing collective dismissal/retrenchment	At present it is a two-member company. Information pertaining to procedure for addressing collective dismissal/retrenchment was shared for review.	NA	Recommend developer to ensure that procedure is established for addressing collective dismissal/retrenchments.
				e. Client to ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner	At present it is a two-member company. Hence, not applicable to the present stage.	NA	Recommend developer to ensure that all workers receive notice of dismissal and severance payments in a timely manner.
3	Protecting the Workforce	Applicable.	Child and Adolescent Labour (Prohibition & Regulation)	Client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the	At present no construction has commenced at the project site. Based on the E&S site visit observations there are no child laborer's present at the project site.	C	Going forward, recommend the developer to ensure that there are no child laborer's present at

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
			Act, 1986 amended in 2016	child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development			the project site during the construction phase.
4	Safe and Healthy Work Environment	Not applicable. The project is currently in the land stage.	World Bank Group General EHS Guidelines, 2007	Physical Hazards, collisions, slips, falls, general facility, design and operations, Integrity of Workplace structures, workspace & exit, fire precautions, lavatories and showers, portable water supply, clean eating area, lighting, safe access, first aid, air supply, work environment temperature	The project is currently in the land stage. Hence, not applicable.	NA	None.
				Communication and training- toolbox talks	The project is currently in the land stage and no construction activity has commenced at the project site.	NA	None.
				Accidents & disease monitoring	At present no construction activity has commenced at the project site. Hence not applicable.	NA	None.
5.	Workers engaged		Contract Labour	1. Registration of establishment as	At present no construction activity has commenced at the	NA	Recommend obtaining contract

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
	by third parties		(Regulation and Abolition) Act, 1970	principal employer (u/s 7) 2. Contractor's license for workers more than 50 (u/12)	project site. Hence not applicable.		labour registration and contractor's license during the construction stage of the project.
6	Worker's accommodation process and standards		IFC Guidelines on Workers accommodation: Guidance note by IFC and ERBD	Building construction materials, resistance to earthquakes (labour camps are always temporary in nature) Ventilation, slip resistant flooring Fire extinguishers Water and sanitary connection Canteen, cooking, and laundry facilities Separate toilets Wastewater and solid waste segregation First aid kit	At present no construction activity has commenced at the project site. Hence not applicable.  At present no construction activity has commenced at the project site. Hence not applicable.	NA  NA	Recommend obtaining contract labour registration and contractor's license during the construction stage of the project.  Recommend obtaining contract labour registration and contractor's license during the construction stage of the project
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.			

### 3.9 Assessment of IFC PS 3

**Table 9: IFC PS 3**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Resource Efficiency and Pollution Prevention:	Applicable. The under-construction operations of the project will consume resources (water, energy), reduce GHG emissions and will generate wastes (solid, c & d)	World Bank Group General EHS Guidelines (Part 1: Environmental) & IFC PS 2	a. Reducing project related GHG emissions	The project is pursuing IGBC certification. As informed by the developer they will be utilizing burnt clay protherm bricks for construction. The product aids in heat gain reduction as the U value is better compared to normal bricks.	C	None.
				b. Quantification of GHG emissions	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	Going forward, recommend quantifying GHG emissions during the construction phase of the project.
				c. Water conservation measures - Storm/Rainwater harvesting - zero discharge design/use of treated wastewater to be included in project design	The project is pursuing IGBC certification. The client has not shared any policy statement or plan on zero discharge.	PC	Recommend implementing water conservation measures.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				operation - water reuse			
				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 is pursuing IGBC certification. Energy conservation strategies were not shared for review.	PC	None
2.	Air emissions and Ambient air quality and Wastewater and Ambient Water Quality		World Bank Group EHS Guidelines (Part 1: Environmental) Consent to Establish from TNPCB u/s 25 Water Act and u/s 21 of the Air Act	a. Consent to Establish from TNPCB	At present the proposed project is in the land stage. Going forward recommend to obtain Consent to Establish certificate before commencing construction activity at project site.	NA	Recommended to obtain the certificate before commencing construction work at site.
				b. Comply with the conditions of consent to Establish	Not applicable to the present stage of project operations.	NA	Recommended to get the certificate and comply with all the conditions to establish.
				c. Consent to operate from TNPCB	Not applicable at the present stage	NA	None.
				d. Comply with the conditions to operate	Not applicable at the present stage	NA	None.

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)	At present the project site is in the land stage. There is no construction activity on-going at the project site. Hence not applicable.	NA	Going forward recommend the developer to implement solid waste rules during the construction and operational phase of the proposed project.
4.	Hazardous Waste		World Bank Group EHS Guidelines (Part 1: Environmental) Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2016	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste. u/r 4(2)	At present stage there are no hazardous wastes being generated at site.	NA	None
5.	Construction and Demolition waste		World Bank Group EHS Guidelines (Part 1: Environmental) Construction and Demolition Waste	Mode of disposal of c & d waste. u/r 4	At present the site is in the land stage. There is no construction or demolition waste being generated at the project site.	NA	None.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
			Management Rules, 2016				
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)	At present there is no e-waste being generated at site	NA	None
7.	Noise Pollution		World Bank Group EHS Guidelines (Part 1: Environmental) & Noise Pollution (Regulation and Control) Rules, 2000	No horn shall be used in silence zones or during night-time in residential areas except during a public emergency Sound emitting construction equipment shall not be used or operated during night-time in residential areas and silence zones	At present the project is in the land stage. There is no	C	None
				Ambient noise monitoring	There is no DG present at site for emergency power supply	NA	None

## 3.10 Assessment of IFC PS4

Table 10: IFC PS 4

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Water Availability	Applicable. Community health: The under-construction activities and the life cycle of the project may have detrimental effects on neighbors. Safety: Structural elements used in the construction activity are designed by competent professional and approved by competent authority. Security: The project site may retain direct or contracted workers to provide to	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.	There is no borewell present at the project site. Hence, not applicable.	NA	None
				b. Installation of digital water flow meter (conforming to BIS standard) in the abstraction structure (s)	There is no borewell present at the project site. Hence, not applicable.	NA	None
2	Infrastructure and Equipment Design & Safety	activity are designed by competent professional and approved by competent authority. Security: The project site may retain direct or contracted workers to provide to	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 there is no construction activity on-going at the project site. Hence, not applicable.	NA	None
				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	At present there is no construction activity on-going at the project site. Hence, not applicable.	NA	None

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
		safeguard its property		the operation of such equipment.			
3	Hazardous Materials and Management Safety			Exercise of special care where there is a potential for public (workers and their families to be exposed to hazardous materials and substances	At present, there is no presence of hazardous materials and substances.	NA	None
4	Ecosystem Services			Client to avoid degradation of natural resources that may result in adverse health and safety risks and impacts to affected communities.	The project location does not have detrimental effects on any ecosystem services.	C	None
5	Community exposure to disease			Client to minimize exposure to Covid 19 and other communicable diseases	Not applicable to the present stage of project operations.	NA	None.
6	Emergency Preparedness and Response Systems			In addition, this aspect specified in IFC PS 1 Client to assist and collaborate with affected communities, local government agencies to respond effectively to emergency situations.	At present, there are no affected communities at site	NA	Recommended to include procedure and measures to inculcate collaboration with affected communities
7	Life & Fire Safety			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	No construction activity has commenced at the project site. Not applicable to the present stage.	NA

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
			Maharashtra Fire Prevention & Life Safety Measures Act, 2006	<ul style="list-style-type: none"> <li>- alarm system</li> <li>- automatic sprinkler system</li> </ul>			
				b. Obtaining provisional Fire NOC at the time of obtaining commencement certificate from the Municipal Corporation	No construction activity has commenced at the project site. Not applicable to the present stage.	NA	None
8	Security Personnel		Private Securities Agency Regulation Act, 2005	<p>Client retaining direct or contracted workers to provide security to safeguard its personnel and property the following shall be the guiding principles:</p> <ul style="list-style-type: none"> <li>-hiring</li> <li>-rules of conduct</li> <li>-training</li> <li>-equipping</li> <li>-monitoring of such workers</li> </ul>	There are no security guards present at the proposed project site. Hence not applicable	NA	None.

### 3.11 Assessment of IFC PS 5

**Table 11: 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	Based on the E&S due diligence exercise, there are no instance of land acquisition or involuntary	NA	None

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				project designs balancing environmental	resettlement due to the project		
				b. Compensation and benefits for displaced persons if applicable	Not required as there is no displacement of persons	NA	None
				c. Client will engage with affected communities through the process of stakeholder engagement described in PS 1	At present there are no affected communities due to the project site.	NA	Going forward it is recommended that the Client should develop a stakeholder engagement for affected communities
				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 due to the project site.	NA	Going forward it is recommended that the Client must develop a grievance mechanism for affected communities
				e. Implementation of Resettlement Action Plan or Livelihood restoration Plan	As there has been no instance of involuntary resettlement or acquisition, no plan facilitating the same is required	NA	None

## 3.12 Assessment of IFC PS 6

Table 12: IFC PS6

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Biodiversity Conservation and Sustainable Management of Living Resources	Not Applicable for the project	IFC PS 6	a. Protection and conservation of biodiversity	The project site does not fall under modified habitats, natural habitat, and critical habitat	NA	None
				b. Management of ecosystem services	The project is not likely to have adverse impacts on ecosystem services. Two key ecosystems such as Annamalai tiger reserve is located at 38km from the project site. Additionally, Parambikulam wildlife sanctuary is located 54 km from the project site.	NA	None
				c. Sustainable Management of Living Natural Resources	The Client is not engaged in the production of living natural resources such as natural and plantation forestry, agriculture, animal husbandry, fisheries etc.	NA	None

## 3.13 Assessment of IFC PS 7

Table 13: 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 and scale of such impacts	The project site does not identify any indigenous people likely to be affected by the project activities	NA	None
				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 no need for an engagement process.	NA	Going forward it is recommended as a good practice that the Client must develop an engagement plan with affected communities of indigenous people

### 3.14 Assessment of IFC PS 8

**Table 14: IFC PS8**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Cultural Heritage	Applicable for the project	IFC PS8 and The Ancient Monuments and Archaeological Sites and Remains (Amendment and Validation) Act 2010	The project site should not cause adverse impacts to cultural heritage sites	The Mandapakkadu (burial grounds of the royals with presence of coins) is recognized as a Cultural Heritage site by Government of India. It is located 19 km from the proposed project site.	NA	None

### Assessment Of Green Building Certification

**Table 15: Green building Certification**

S N	Aspect	Certification Checkpoint	Observation	Compliance Status	Recommendation
1	Green Building	Achieved certification	As informed by the developer, the proposed project will be pursuing green building certification.	C	None.
		Certification Category (Gold/Silver/Platinum)			
		Renewal of Certificate			
		Maintenance of documents complying to green building audit			
2	Additional Sustainability Certification	Achieved certification	As informed by the developer additional sustainability certification is not being pursued at the project site.	NC	It is a good practice to achieve sustainability certification
3	International Certification	Achieved certification	As informed by the developer no international certification is being pursued at the project site.	NC	It is a good practice to achieve international certification

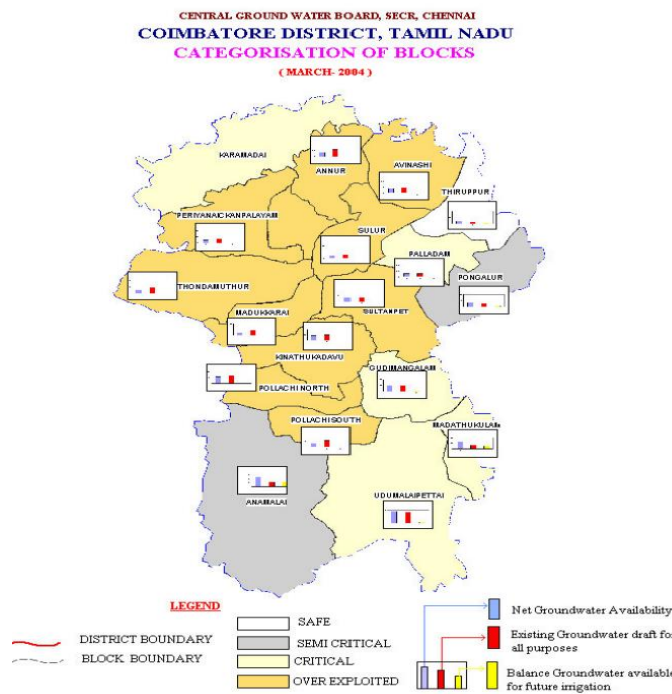
### 3.15 Compliance to ADB Safeguards- Key findings

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

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

29. **Groundwater Status:** As per the Groundwater Exploitation Assessment Report by Central Ground Water Board (CGWB), the project site located in Periyanegamam Village, Pollachi Taluk, Coimbatore District is classified as “Over-Exploited”. It is proposed therefore, that the project purchases water from nearby approved water sources for construction purposes. If groundwater is proposed to be used, a NOC from the local panchayat needs to be obtained.

Therefore, the risk of the project for depleting groundwater level is classified as “HIGH”.



**Figure 6 Groundwater Categorization Map**

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

- a. **Earthquake:** According to Building Materials and Technology Promotion Council (BMPTC) Earthquake hazard map, the project site lies in the **Zone III i.e., Moderate Damage Risk Zone (MSK VI)**.
- b. **Flood :** According to BMPTC Flood Hazard Map, the project site is in the **Low Risk Zone**.
- c. **Cyclone :** The project is in the **Moderate Damage Risk Zone** with a basic wind speed of 39m/s as per BMPTC Wind and Cyclone Hazard Map.
- d. **Landslide:** The project site is **Low risk** to landslides as per BMPTC report.
- e. **Thunderstorm :** According to BMPTC Thunderstorm Incidence Map the site is in **Moderate risk zone**.

- f. **Drought** : There were **no severe drought** events happened in Coimbatore region from last 3 years, but as per Environmental Information System Tamil Nadu (ENVIS) report Coimbatore is vulnerable to Drought.

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

31. **Critically Polluted area**: The project site is surrounded by agricultural fields mainly of Coconut plantation. The project site is not located within 5km distance any notified polluted areas as per Central Pollution Control Board in the ‘Comprehensive Environmental Assessment of Industrial Clusters’, 2013. The nearest notified polluted area to the project site is Coimbatore, within 43 Km from the project site.

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

32. **Presence of Municipal Dump site/Hazardous Waste Landfills**: The nearest dump site near to the project area is Negamam Panchayat dump site which is 3Km away from the site area. No hazardous waste landfill is present near to the site.

Thus, the risk of exposure to pollution from dump sites to the project is “**Low**”

#### Source of Pollution around Project Location:

Sl.No	Factories/Industries near to project site	Distance from Project site
1.	Vasantham Curled Coir Factory	Within 2Km
2.	Ambika Timber Depot	744.94m
3.	Shithco Agro Oil Industries Pvt.Ltd	5.62Km

The risk of exposure to pollution from the nearby industries to the project is **negligible**.

The risk from environmental stress/climate change on project is classified as “**MEDIUM**”

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

#### 3.15.2 Impact of Project on Environment and Climate Change

33. **Impact on Protected Areas**: Annamalai Tiger Reserve is the nearest protected area located at an approximate distance of 38Km. However, the project activities will not have any impact on the forest.

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

34. **Impact on Water**: The project shall use water from tankers for construction purposes. During the operational phase the project site shall be installing a Sewage Treatment Plant (STP). The developer to comply with the conditions for the wastewater management as specified in the Consent to Operate certificate for the proposed project site.

Therefore, the risk to the water resources from the current state of the project site is negligible.

35. **Impact on Air/GHG Emissions**: During construction and operational phase the project site shall utilize DG sets for emergency power supply of requisite capacity specified in CTE and CTO received for proposed project site. DG sets to be housed in an acoustic enclosure with sufficient height and ambient noise monitoring to be conducted regularly.

Therefore, the risk to the air resources from the current state of the project site is negligible.

The risk of the project activities on environment/climate change is classified as 'LOW.'

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

### 3.15.3 Social Impact Assessment

36. 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.

#### Land ownership and Transfer details:

37. The proposed project land is in the name of the company [REDACTED]. The land is classified as dry agricultural land as per revenue records. Due diligence has confirmed that there are no structures or loss of livelihood and there are no involuntary resettlement impacts identified within the property or relocations or evictions from the property. [REDACTED]

[REDACTED] The site also does not have presence of indigenous people as confirmed in the involuntary resettlement and indigenous population checklist documented as annexure 3 and 4. The proposed project site is categorized as B2 under EIA notification 2006 and no public consultations are required to be undertaken. However, in compliance with ADB SPS,2009, stakeholder consultations will be carried out and a detailed stakeholder engagement plan will be prepared in compliance with ADB SPS 2009.

#### Proximity to Cultural, Religious and Heritage sites :

##### Heritage Site

SI.NO	Heritage site	Locality	Distance from Project site
1.	Mandapakkadu(structure with mounds)	Chettipalayam	19.44Km
2.	Pandava Graves(Pre-Historic site)	Kanyampudi	54Km

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

##### Religious Center

SI.NO	Name of Religious Places	Distance from Project site
1.	Raamar Kovil	931.67m
2.	Karuparayan Temple	3.79Km
3.	Sri Bhagavathi Temple	2.09Km
4.	St.Jospeh Church	27.55Km
5.	St.Sebastain Church	34.22Km
6.	Christ the King Church	32.49Km
7.	Markaz Masjid	13.06Km
8.	Kumaran Nagar Mosque	13.75Km
9.	Tntj Mosque	14.19Km

38. 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.

The risk to the project based on cultural, heritage and religious site is classified as **LOW**.

### 3.15.4 Stakeholder Engagement

39. The project promoter shall develop 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. The first set of stakeholder consultations shall be conducted prior to investment in the project. The details of the consultations will be shared in the Social Safeguards Monitoring Report (SSMR) that shall be submitted to ADB on a half year basis.

#### Grievance Mechanism:

40. 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.

#### Provision of welfare facilities for workers:

41. Construction hasn't commenced, and contract has not been awarded yet. It was expected that the selected contractor would be required to develop an Environmental, Health, and Safety (EHS) Plan, which would undergo approval by the company. This plan will encompass the provision of welfare facilities for the workers.

#### Prevention of child/forced labor:

42. At present, no construction has commenced at the project site. Based on the E&S site visit observations, there are no child laborer's present at the project site. It is expected that the contractor appointed for the construction must comply with the child labour (Prohibition and Regulation Act 2016) during the construction phase of the project.

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

43. An anti-bribery and anti-corruption policy was not shared for review. It is expected that the company must adopt a policy on anti-bribery and anti-corruption which shall be communicated to TNSF.

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

## 4 ENVIRONMENT AND SOCIAL ACTION PLAN

### 4.1 Methodology of Action Plan

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

44. 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.

The following key elements to be included in action plan:

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

### 4.2 Prioritization of Actions

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

<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 16: Environment and Social Action Plan**

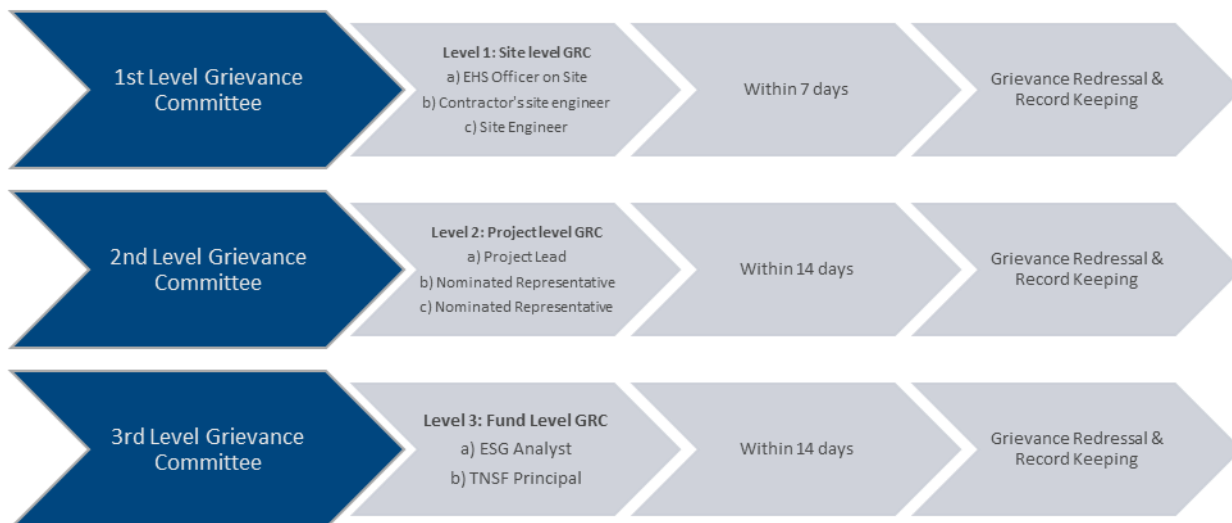
S N	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
Legal Requirements- Environment							
1	Consent to Establish	Recommend obtaining Consent to Establish certificate before commencing construction activity at the project site.	Developer	Before commencing project operations	High	To be obtained	1 lakh

S N	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
<b>Project Insurances</b>							
1	Insurances	General Insurance of the project not shared for review	Developer	3 months	High	To be obtained	0.5 lakh
<b>Assessment of IFC PS 1- Identification of Environmental &amp; Social Risks and Impacts</b>							
1	Policy	E & S Policy to be formulated at entity level. The E & S Policy should be compliant with national legal requirements. The policy to indicate who within the client organization will conform and execute the policy	Developer	3 months	Medium	To be formulated and implemented at project level	5 lakh
2	Monitoring and Review	Recommend to develop an Environmental and Social Mangament System to identify and mitigate environmental and social risks of the proposed project site.	Developer	3 months	Medium	To be reviewed and changes to be implemented at project level	2 lakhs
3	Stakeholder Engagemen t	Developing a Stakeholder analysis which includes the following: -Effective participation of disadvantaged or vulnerable communities -Resources and Responsibilities - Monitoring and Reporting	Developer	3 months	Medium	To be shared with TNSF and be implemented at project level	1 lakh
4	External Communica tions and Grievance Mechanism	Implementing a grievance redressal procedure at site and corporate level which should include the following: -Designate roles and responsibilities at the project level. -Maintain a procedure for reporting of grievance complaints. -Set time period for addressing grievance and escalation	Developer	3 months	Medium	To be shared with TNSF and be implemented at project level	4 lakhs
<b>Compliance to ADB Safeguards</b>							

S N	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
1	Presence of municipal dumpsite	Recommend ensuring that waste stored at the Negamam Panchayat does not have adverse impact on the project site.	Developer	6 months	Medium	To be ensured by the contractor and the developer,	NA
2	Groundwater status	The project site, groundwater status is classified as 'overexploited'. Recommend ensuring no overexploitation of groundwater at the proposed project site.	Developer	3 months	High	To be ensured by the contractor and the developer,	NA
3	Involuntary Resettlement	The project site does not have any involuntary resettlement impacts. Due Diligence confirms the same	NA	NA	NA	NA	NA
4	Indigenous Population	The land is uninhabited. 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.	NA	NA	NA	NA	NA

## 5 GRIEVANCE REDRESSAL MECHANISM

46. A Grievance Redress Mechanism for external stakeholders is established in line with the ADB SPS, 2009 to address matters related to environmental and social aspects of the project. The main objective of the Grievance Redressal Mechanism is to provide a time-bound and transparent mechanism to voice and resolve complaints of the people affected in the project area. It is recognized that the Grievance Redress Mechanism provided does not impede or replace the grievance resolution process offered by the legal system of the country.
47. There exist three levels of Grievance Redressal Mechanisms- a) Site Level, b) Project Level, and c) Fund Level. At the site level, the contractor shall nominate 2-3 grievance redressal officers and their names, and the contact details shall be displayed at prominent locations in the site, in both English and Tamil. At the project level, a nodal person will be responsible for handling grievances. They will (i) record the complaints, categorize, and prioritize them; (ii) consult with all relevant stakeholders (including contractors, SHE officer), visit the project site, and do the required examination; (iii) settle the grievances in consultation with the complainant and the project staff; (iv) report to the aggrieved parties about the decision/solution; and (v) forward the unresolved cases to higher authorities for resolution. In case of complex complaints, the nodal person will inform the project director and guide him about practical options for resolving the grievances. At the fund level, there will be a grievance redressal officer nominated who shall handle the grievances at the fund level.
- a. The project team will regularly examine the grievance resolution process, including the record of grievances received and their resolutions.
  - b. The Grievance Redressal Mechanism (GRM) will be designed in accordance with the grievance redressal approach of the World Bank and ADB for projects.
  - c. Procedure - The GRM addresses three groups of stakeholders: external stakeholders at the project site, those impacted by the project, and the Fund's investors.



### Step 1: Appointment of Site Level Grievance Redressal Officer and Management Level Grievance Redressal Officer

- a. The contractor, in consultation with the Project Lead and TNSF's ESG team, will appoint a Site Level Grievance Redressal Officer. The site-level GRO, ESG Analyst, and Project Lead will conduct a rapid assessment of contentious issues/disputes related to the project, such as land ownership/rights, ethnic/community rights, or labor matters, and the relevant stakeholders. This

assessment will rely on existing information from the project, government departments, and the local community.

- b. The assessment will identify key stakeholders involved in these issues and the nature of the disputes (informed, polarized, etc.). Special attention will be given to the local dispute resolution culture and the ability and track record of stakeholders to resolve disputes through mediation or constructive negotiation.
- c. The Management, in consultation with the Project Lead and TNSF, will appoint a Management Level Grievance Redressal Officer.
- d. The names, titles, contact numbers, and email addresses of the Site Level, Management Level, and Fund Level GROs will be prominently displayed in both the local language and English at the project site's entrance.

## **Step 2: Receipt of grievances and complaints**

- a. Grievances can be submitted through various channels, including phone, mail/courier, SMS, website, or in-person meetings. These channels will be made known and promoted on the project site.
- b. A Grievance Register (GR) will be kept at the Project Site Office to document grievances. If an aggrieved party communicates their grievance verbally, the Site Level Grievance Redressal Officer will make a record of the grievance/complaint.
- c. It is crucial that all complaints are documented in writing and stored in a database. The Site Level Grievance Redressal Officer will maintain a central log of all grievances received through the mentioned channels, using an Excel file.
- d. Staff members who receive verbal complaints should transcribe them into the central grievance log to enable tracking.
- e. Any grievances received anonymously should also be included in the grievance log.
- f. Each received grievance will be assigned a unique grievance number, and the Site Level Grievance Redressal Officer will acknowledge its receipt within 24 hours. This acknowledgment will be communicated to the aggrieved party either verbally or in writing, along with an estimated timeframe for providing additional information.
  - The Site Level Grievance Redressal Officer will keep a record of these acknowledgment communications in the central grievance log.

## **Step 3: Resolving Grievances and Complaints**

- a. The Site Level Grievance Redressal Officer will categorize grievances as high, medium, or low priority based on the nature of the issue raised (e.g., physical, and economic displacement, grievances from indigenous communities, inconvenience due to vehicular activities, accidents, near-misses, pollution, etc.), and the project's impact on the environment and the aggrieved party.
- b. High priority grievances may involve issues with long-lasting effects beyond the project's duration, while medium priority grievances have a moderate impact that can be reversed with corrective actions. Low priority grievances are short-term and can be resolved with minimal or minor adjustments.
- c. Using this categorization and assessing the seriousness of the issue, the Site Level Grievance Redressal Officer will prioritize complaints for appropriate follow-up actions.
- d. The Site GRO will review the received grievances/complaints and direct them to the relevant department for necessary action, keeping the project site head or in-charge informed.
- e. It is expected that most issues raised will be informational feedback requiring minor course corrections, generally handled by the project owner's representatives on-site.
- f. Governance-related issues will be addressed at the management level, involving the Management Level Grievance Redressal Officer.
- g. The relevant department will respond to the Site GRO within seven days of receiving the complaint, including any necessary actions, with approval from the site head.

- h. If the Site Level GRO cannot resolve the grievance, it will be escalated to the Management Level GRO, with a total resolution time not exceeding seven days (including both site and management levels).
- i. If after seven days, there are still unresolved issues, the complaint will be forwarded to the Fund-Level Grievance Redressal Committee for resolution within the next seven days.
- j. The Site Level GRO is responsible for timely closing all grievances received from external stakeholders at the project site and those affected by the project.
- k. The Site Level GRO will inform the aggrieved party of the response and actions taken, obtaining their acknowledgment.
- l. Based on the acknowledgment from the aggrieved party, the Site Level GRO will close the complaint in the grievance log.
- m. The Site Level GRO will share the grievance log with the Management Level GRO and Project Lead of TNSF on a fortnightly basis.
- n. The grievance log will also be included in the quarterly project progress reports submitted to TNSF's ESG team.
- o. The Project Lead, in consultation with the Site Level GRO, Management Level GRO, and Fund Level Grievance Redressal Committee, will ensure that all grievances are closed within the quarter.
- p. The site will maintain, at a minimum, a database containing the following metrics:
  - Number of complaints received.
  - Number of complaints resolved.
  - Details of complaints that underwent mediation (through arbitration or involvement of other parties like community representatives, legal representatives, TNSF legal counsel, etc.).
  - Grievances and complaints received from investors.
  - Names of Grievance Committee Members at Project and Site Level.

The grievance resolution process, along with the log of grievances received and their resolutions provided will be periodically reviewed by the project team.

The Grievance Redressal Mechanism (GRM) shall be aligned to the World Bank and ADB's approach to grievance redressal in projects.

Procedure - The GRM covers three categories of stakeholders namely external stakeholders at the project site, those affected by the project, and the investors of the Fund.

### **Step 1: Nomination of Site Level Grievance Redressal Officer and Management Level Grievance Redressal Officer**

- a. There will be a nomination of one site Level Grievance Redressal Officer by the contractor in consultation with Project Lead and ESG team of TNSF. The site level GRO, ESG Analyst and Project Lead shall conduct a rapid review of contentious issues/ disputes related to the project such as, land ownership/rights, ethnic/community rights, or labor issues, and related stakeholders, relying on existing information from the project, relevant government departments and community around project site.
- b. The review will map who the key stakeholders to these issues are and what the nature of the debate is (informed, polarized, etc.). Attention will be paid to the local dispute resolution culture and, particularly, to the capacity and track-record of stakeholders to settle disputes through mediation or constructive negotiation.
- c. There will be a nomination of one Management Level Grievance Redressal Officer by the Management in consultation with Project Lead and TNSF.
- d. The names, positions/designations, contact numbers and email of the site Level, Management Level and Fund Level GROs will be displayed prominently in local language as well as in English, at the entrance to the project site.

## Step 2: Receiving of grievances and complaints

- a. The grievances can be received by any or all of the following means: phone, post/courier, SMS, webpage, or face-to-face. The uptake channels should be publicized and advertised at the site.
- b. A Grievance Register (GR) will be maintained at the Project Site Office for recording the grievances. The site Level GRO will record the grievance/ complaint if communicated verbally by the aggrieved party.
- c. It is important that all complaints are logged in writing and maintained in a database. A central log of all the grievances received through the above means will be maintained by the site Level GRO, in an excel file.
- d. Staff members who receive complaints verbally should put them in writing into the central grievance log, for them to be tracked.
- e. Any grievances received anonymously should also get recorded in the grievance log.
- f. Every grievance received will be identified with a grievance number and the same shall be communicated to the aggrieved party as an acknowledgement verbally or in-writing by the site Level GRO within 24 hours of the receipt, also telling him/her when to expect further information.

The record of communication of the acknowledgement will be maintained by the site Level GRO in the central grievance log.

## Step 3: Resolution of grievances and complaints

- a. Grievances will be categorized by the Site Level GRO as high, medium, and low priority according to the type of issue raised (e.g., physical, and economic displacement, grievance from indigenous population, inconvenience caused by vehicular movements, accidents, near-misses, pollution, etc.) and the impact of the project on the environment/aggrieved party.
- b. A high priority grievance may be those that can have an impact beyond the activity period and the impact may be irreversible if not acted upon immediately; medium priority grievances are those where the impact is moderate and can be reversed with corrective measure; low priority grievances are those which are short-term and can be resolved through bare minimum or minor corrections.
- c. Based on this categorization and seriousness of the issue raised, the Site Level GRO will prioritize the complaints for appropriate follow up action.
- d. The Site GRO will review the grievances / complaints received and direct it to the appropriate function/ department for necessary action, keeping the project site head/ in-charge in loop.
- e. It is anticipated that most issues raised will be informational in nature or feedback that requires small course corrections; these should generally be handled at the site by the representatives of the project owner.
- f. Issues having to do with governance will be addressed at the Management level, with the involvement of the Management Level GRO.
- g. The function/ department will revert to the Site GRO with their response as soon as possible but not later than 7 days of receipt of complaint, including any action deemed necessary, along with the site head's approval for the same.
- h. In case the Site Level GRO is not able to resolve the grievance, the grievance will be submitted to Management Level GRO and the total time to resolve should not more than 7 days (including site Level and Management Level GRO).
- i. In case, after 7 days, if there are any unresolved issues, the complaint will be transferred to the Fund-Level Grievance Redressal Committee for resolution within the next 7 days.
- j. The Site Level GRO will be accountable for the timely closure of all the grievances received from the external stakeholders at the site and those affected by the project at the project site.
- k. The Site Level GRO will communicate the response and action taken to the aggrieved party and obtain their acknowledgement.
- l. Based on the acknowledgement received from the aggrieved party, the Site Level GRO will close the complaint in the grievance log.

- m. The grievance log will be shared by the Site Level GRO with the Management Level GRO and Project Lead of TNSF on fortnightly basis.
- n. The grievance log will also be included in the quarterly project progress reports submitted to TNSF's ESG team.
- o. The Project Lead in consultation with the Site Level GRO, Management Level GRO and Fund Level GRC will ensure that all the grievances are closed within the quarter.
- p. The site will maintain at a minimum, a database on the following metrics:
  - Number of complaints received.
  - Number of complaints resolved.
  - Details of the complaints that have gone to mediation (through arbitration or involvement of other parties like – community representatives, legal representatives, TNSF legal counsel, etc.)
  - Grievance and complaints received from investors.
  - The names displaying the Grievance Committee Members at Project and Site Level

The sample grievance redressal form is provided under Annexure 4.

## 6 CONCLUSION AND WAY FORWARD

48. 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, 7 ESG issues were evaluated using ESG risk rating tool of which 7 are considered as material ESG risk for the proposed project. Project risk level is 43.056%. Hence, it is medium-high risk level.

The key findings of the study are:

- The due diligence confirms that there are no instances of involuntary land acquisition for the proposed project site.
- The land is currently in the name of the company and is vacant and unused. There are no legacy issues associated with the land.
- The project is expected to have no direct or indirect effects on the dignity, human rights, livelihoods, territories, or the natural and cultural resources associated with indigenous peoples or their ancestral domains and assets.
- The proposed project site is devoid of any human residences, trees, or other structures, meaning that there will be no need for displacement or demolition of houses or buildings because of the construction activities.
- No potential negative impacts from an ESG perspective have been identified for this project.
- The project has activated the Grievance Redress Committee for prompt response to public complaints.

### Way Forward

- The project needs to develop a comprehensive stakeholder engagement and management plan for smooth disclosure of information.
- Training of project staff on the key points of the Environmental and Social Action plan by the project developer.
- Regular monitoring of the recommended measures during the construction phase of the project. The E&S action plan should be revisited in case new impacts/non-compliances are identified.
- Obtaining all the necessary compliances listed as specified in the document.
- The project needs to activate the grievance redress committee for prompt response to public complaints, queries and any other concerns, prior to start of construction.
- The project needs to continuously engage with the stakeholders and potential beneficiaries, building support for the proposed intervention, informing the communities about like job opportunities and any other expected benefits, seeking their feedback and incorporating the same into the project design and/or implementation plan.
- 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 consultation will continue as per the stakeholders engagement plan and will be reported in the subsequent SSMR.

## 7 ANNEXURES

### 7.1 Annexure 1: Site Photographs



Figure 7: Site picture 1



Figure 8: Approaching Road to the side - 30 feet wide



Figure 9: Panoramic view of the site



Figure 10: Site fencing work of the adjacent plot

## 7.2 Annexure 2: Indigenous Peoples Impact Assessment

### 7.2.1 Introduction

49. Each project/subproject/component needs to be screened for any indigenous peoples 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: Pollachi Taluk, Coimbatore District
- b. Location (km): 43 Km from Coimbatore
- c. Civil work dates (proposed):

Technical description: The projects involve the construction of a senior living project with a wellness center and Geriatric center.

Screening Questions for Indigenous Peoples 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 land is uninhabited. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories or natural or cultural resources that are used, owned, occupied, or claimed by indigenous people as their ancestral domain or assets.
2. Are there national or local laws or policies as well as anthropological research/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?				Not applicable.
3. Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable.

<b>KEY CONCERNS</b> (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNO WN	Remarks
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				Not applicable.
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				Not applicable.
6. Do such groups speak a distinct language or dialect?				Not applicable.
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				Not applicable.
8. Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision- making bodies at the national or local levels?				Not applicable.
Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target indigenous people?		√		
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		√		

<b>KEY CONCERNS</b> (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNO WN	Remarks
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 Peoples Impact

50. 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.

**7.3 Annexure 3: Involuntary Resettlement Impact Assessment**

1. Introduction

51. 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: Coimbatore
- b. Location (km): 43km. from Coimbatore
- c. Civil work dates (proposed): -
- d. Technical description: The proposed project involves the construction of a senior living project with a wellness center and geriatric center.

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 is not subjected to an acquisition.
2. Is the site for land acquisition known?				Not applicable.
3. Is the ownership status and current usage of land to be acquired known?				Not applicable. [REDACTED]
4. Will easement be utilized within an existing Right of Way (ROW)?	√			
5. Will there be loss of shelter and residential land due to land acquisition?				Not applicable.
6. Will there be loss of agricultural and other productive assets due to land acquisition?				Not applicable.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable.
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.
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
10. Will people lose access to natural resources, communal facilities, and services?		√		
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		
12. Will access to land and resources owned communally or by the state be restricted?		√		
<b>Information on Displaced Persons:</b>				
Any estimate of the likely number of persons that will be displaced by the Project? If yes, approximately how many?				<input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A
Are any of them poor, female-heads of households, or vulnerable to poverty risks?				<input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A
Are any displaced persons from indigenous or ethnic minority groups?				<input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A

### 7.4 Annexure 4: Sample Grievance Registration Form

(To be made available in Local Language- Tamil)

52. The Proposed Senior Living 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.
53. 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			

## **7.5 Annexure 5: Land documents are available with TNIFMC upon request**