

FARAKKA RAIGANJ SECTION OF NH-12

A. Environment and Social Action Plan (Operation and Maintenance)

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion after closing (22 nd September 2020)
1	Compliance			
1.1	Develop environmental and social legal register for the project to ensure compliance to all applicable environmental clearance and permit conditions	FRHL	Legal Register	December 2020
1.2	Obtain CTO from WBPCB for Project Road Obtain consent for DG sets at toll plazas	FRHL	Communication and liaison with NHAI to obtain the CTO for the project Obtain CTO for DG sets	December 2020
1.3	Obtain authorization for hazardous waste handling and management at toll plazas.	FRHL	Make application to obtain authorisation	December 2020
1.4	Obtain permits for all the bore wells constructed for the project from State Water Investigation Directorate (SWID)	FRHL	Make application to obtain the approval	December 2020
2	EHS Management System			
2.1	Environmental and Social Management System (ESMS) to be prepared for the project incorporating Standard Operating Procedures (SOPs) for O&M stage of the project. Following plans should be prepared and included in the ESMS. <ul style="list-style-type: none"> • Carriageway Waste Management Plan; • Oil/Chemical Spill Contingent Plan; • Contractor Management Plan; • Stakeholder Engagement Plan (SEP) and Grievance Redressal Mechanism • Occupational, Health and Safety and Emergency Response Plan • Security Management Plan • Encroachment Management • Workers Accommodation Plan 	FRHL	ESMS and SOPs	March 2021

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2.3	Responsibility for implementation and monitoring of ESMS related to O&M phase of the project should be assigned to qualified person.	FRHL	Through qualified staff	March 2021
3	Labour and Working Conditions			
3.1	FRHL will upgrade its HR policies and procedures to meet PS2 requirement, particularly it will include: policy commitment to equal opportunity, workforce protection and non- discrimination; implementation of an employee grievance redress mechanism covering contract workers; contractor management & compliance; improving worker accommodation; and enhanced occupational health. Statutory deductions should be made from wages/salaries of all eligible workers under PF and ESI legislations. Expired BOCW registration certificates should be renewed by respective sub-contractors.	FRHL for	<ul style="list-style-type: none"> Upgraded HR policies and procedures PF Challans, ESI cards, Disposition of amount at EPFO. BOCW renewal certificates 	March 2021 Monthly basis - ongoing December 2020
3.2	Principal employer's registration under Inter-state Migrant Workmen Act should be obtained by NHAI.	FRHL to follow up with NHAI to meet this requirement	Principal employer's registration of NHAI under the law	Obtain by January 2021 - application to be made immediately
3.3	License of Clifford Agency under the private security law.	FRHL and HCC O&M appointed Supervisors and sub-contractors	Registration of Clifford Agency under PSARA 2005,	December 2020
4	Pollution Prevention and Resource Efficiency			
4.1	Provide stack with all the DG sets (as per CPCB standard) located at toll plazas	FRHL	Stack with DG set	January 2021
4.2	Hazardous waste storage area would be provided as per CPCB guidelines. Spill kit would be made available at the storage facility.	FRHL	Physical Verification	March 2021
4.3	FRHL should ensure that debris and solid waste from the ROW are removed periodically.	FRHL	Physical Verification	Regular
4.4	Ambient environment quality (air, ground and surface water, noise quality) should be monitored near sensitive receptor adjacent to the project road.	FRHL	Monitoring result	On Annual basis
4.5	Air emission from the DG sets would be monitored.	FRHL	Monitoring result	On Annual basis
4.6	Water flow meter should be installed with bore wells installed at the project site (toll plazas, rest areas, truck lay by etc.) and water consumption should be monitored regularly. Effort would be given to reduce water consumption.	FRHL	Physical Verification, quantity of water consumed	March 2021

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4.7	FRHL should endeavor to undertake GHG accounting for their respective project. The ESMS to be prepared for the project would include requirement GHG accounting.	FRHL	GHG accounting report	On Annual basis
5	Community, Health Safety and Security			
5.1	FRHL to carry out root cause analysis of accidents. Road safety audit should be conducted by a competent agency after construction is completed and the Improvement Plan should be implemented.	FRHL	Road safety audit and Improvement Plan	Road Safety Audit by March 2021 and Implementation of proposals - March 2022 and continued
6	Occupational, Health and Safety			
6.1	All workers engaged in construction and O&M work should be provided with adequate PPEs.	FRHL through O&M contractor	Physical Verification	December 2020 and Continuous
6.2	Monitoring and supervision should be strengthened to ensure use of PPEs by road maintenance workers.	FRHL	Physical Verification, monitoring report	December 2020
6.3	Adequate fire extinguisher should be made available at high speed diesel storage area at toll plaza.	FRHL	Physical Verification	December 2020
7	Land Acquisition and Involuntary Resettlement			
7.1	Update the encroachment details within project RoW	FRHL	Updated encroachment survey data	December 2020
7.2	<p>The eviction of existing encroachments is not planned in near future and could be undertaken when further widening program is materialize.</p> <p>Compensation issues for any future displacement of the occupants will entail a need for an SIA and RAP and</p> <p>A. In case of informal dwellers if removed in future the company needs to work with NHAI/other govt departments to ensure that the provisions of PS 5 are met.</p> <p>B. For encroachments being removed, the company needs to monitor and document the process (to the extent possible), and ensure that in case there are reasons for grievances, the affected person is provided access to the GR mechanism.</p>	FRHL/NHAI	SIA/RAP if eviction of encroachers is planned or taken up.	Before any future eviction/displacement/acquisition

B. Environmental and Social Corrective Action Plan (Construction Phase)

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Measurable Outcome/ Documentation	Target Timelines for Completion after closing
1	Compliances		
1.1	Develop environmental and social legal register for the project to ensure compliance to all applicable environmental clearance and permit conditions	Legal Register	December 2020
1.3	Apply CTE & CTO for diesel generator sets used at construction site.	CTE & CTO	
1.4	Renew authorization for hazardous waste handling and management at construction camp at 18 Miles, Laxmipur	Renewed authorization	
1.5	Obtain permits for all the bore wells constructed for the project from State Water Investigation Directorate (SWID)	Permits for bore well	March 2021
2	EHS Management System		
2.1	Progress on EMP implementation from EPC contractor to be monitored at the corporate office.	Monitoring report	During Construction period
3	Labour and Working Conditions		
3.1	<p>FRHL through EPC contractor should ensure that the contractor follow procedures to meet PS2 requirement, particularly it will include: policy commitment to equal opportunity, workforce protection and non- discrimination; implementation of an employee grievance redress mechanism covering contract workers; contractor management & compliance; improving worker accommodation; and enhanced occupational health.</p> <p>Statutory deductions should be made from wages/salaries of all eligible workers under PF and ESI legislations.</p> <p>The labour accommodation whether temporary or long-term should be designed and maintained as per IFC Worker Accommodation: Processes and Standards and BOCW Act 1996</p>	EPC contract with inclusion of PS-2 requirements	<p>November 2020</p> <p>Continuous</p>
4	Pollution Prevention and Resource Efficiency		
4.1	Provide stack with all the DG sets (as per CPCB standard) located at construction site	Stack with DG set	December 2020 (for ongoing construction)
4.2	FRHL through EPC contractor should ensure that hazardous waste such as used oil, grease would be stored at properly covered area with secondary containment and bunding. For hazardous waste storage area, CPCB guidelines need to be followed. Spill kit would be made available at the storage facility.	Physical Verification	March 2021
5	Community Health Safety and Security		
5.1	Barrier/fencing should be provided at road construction site as per IRC SP 055.	Physical Verification	During Construction Period
6	Occupational Health and Safety		
6.1	All workers engaged in construction work should be provided with adequate PPEs.	Physical Verification	December 2020 (for ongoing construction)

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6.2	Monitoring and supervision should be strengthened to ensure use of PPEs by construction workers.	Physical Verification, monitoring report	December 2020 (for ongoing construction)