



Environmental and Social Due Diligence of Jaipur-Mahua Project Road, National Highway-11 : *Jaipur & Dausa District, Rajasthan*

Final Report

December 2014

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I-Squared Capital

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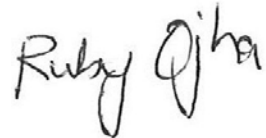
Environmental and Social Due
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Road, National Highway-11 : Jaipur
& Dausa District, Rajasthan

09 December 2014

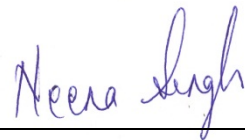
Reference # I10429/ 0258116

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ACRONYMS

CA	Competent Authority
CPCB	Central Pollution Control Board
EIA	Environment Impact Assessment
EMP	Environment Management Plan
ESDD	Environmental and Social Due Diligence
EPC	Engineering Procurement Construction
EHV	Extra High Voltage
ESAP	Environmental and Social Action Plan
FPIC	Free, Prior and Informed Consent
IFC	International Finance Corporation
ISC	I-Squared Capital
JMTPL	Jaipur Mahua Tollway Private Limited
LA	Land Acquisition
LHS	Left Hand Side
MoEF	Ministry of Environment and Forest
NHAI	National Highway Authority of India
PD	Project Director
RoW	Right of Way
RAP	Resettlement Action Plan
RHS	Right hand Side
RRVPL	Rajasthan Rajya Vidyut Prasaran Nigam Limited
RSPCB	Rajasthan State Pollution Control Board
SDO	Sub Divisional Officer
SIA	Social Impact Assessment
SPV	Special Purpose Vehicle

EXECUTIVE SUMMARY

ERM has been commissioned by I-Squared Capital (hereinafter referred to as “ISC”) to undertake an Environmental and Social Due Diligence (ESDD) of Jaipur Mahua Toll Private Limited (JMTPL) ⁽¹⁾ -) that has been set up for the operation and maintenance of the 110 km stretch of National Highway-11 (hereafter referred to as the project corridor) from Jaipur (km 228) up to Mahua (km 120).

The objective of this ESDD is to verify the compliance status of the project corridor against the specified reference framework as interpreted and applied through the screening criteria for operational toll roads of the International Finance Corporation (IFC). Further the ESDD also included a review of the land acquisition process and JMTPL’s overall management systems in place or proposed to address foreseeable environmental, health and safety and social risks.

A summary of key issues against IFC’s ESDD Criteria for Operational Toll Roads is provided in the table below:

Criteria	Key Gaps and Issues
Litigation	<ul style="list-style-type: none">• A stay order has been issued by the High Court of Delhi, where NHAI and JMTPL are opposing parties. NHAI had levied a penalty of INR 72 lakhs for non-pursuance of clause 18.3 of the Concession Agreement that summarizes non-plantation of trees. A stay order has been placed by Delhi High Court in this regard;• Two impacted entities (a local temple and a landowner) have received a stay order from the High court against NHAI’s plans of shifting the temple property located at Mohanpura village. The temple is protruding into the RoW and due to that there is a break in the service road.• Reportedly in Jaipur, Bassi & Sanganer there are 38 ongoing cases in the Lower Court regarding ownership dispute and fairness of compensation and 8 cases in Rajasthan High court challenging land acquisition
Legal Permits/Consents	<ul style="list-style-type: none">• Consent to Operate and Consent to Establish for the Hot Mix Plant has not been obtained by JMTPL’s sub-contractor.
Assessment and Management of Environment and Social Risks and Impacts	<ul style="list-style-type: none">• JMTPL does not have a documented Environmental and Social Management System. The EMP that was developed with the Detailed Project Report and the Environmental Impact Assessment is a document related to construction works and activities and does not describe specifically the operation related measures commensurate with the nature and scale of impacts.
Land and Resettlement issues	<ul style="list-style-type: none">• R&R issues(as per the screening criteria category 1) have been addressed except a few squatters who are not eligible for compensation under the NH Act, a few structures that are still lying in the ROW on account of ongoing litigations, incomplete payment of compensation and title disputes etc.

(1) JMTPL is a Special Purpose Vehicle established as a Concessionaire and a direct subsidiary company of the IJM Group

Criteria	Key Gaps and Issues
Stakeholder/Community Engagement	<ul style="list-style-type: none"> JMTPL does not have a formal Stakeholder Engagement Plan in place. There is no formal mechanism to engage directly with the community and it is reported that their main engagement is with NHAI and the district administration along with Jaipur Development Authority. No community development work or CSR activity is undertaken by JMTPL or any of the contracted companies in the area.
Health & Safety	<ul style="list-style-type: none"> Highway patrolling is not adequate as the response time for an emergency is more than 15 minutes. Increase in the number of accidents on the project stretch over the past 3 years.
HR/ Contractor Management	Contractor management procedures on selection, monitoring of compliance and follow-up have not been established by JMTPL. Contractor agreements include Terms and conditions which among other things includes conditions of abiding by all applicable laws, regulations of state and central government and requirements of Company's safety manual failure to results in 'stop work' or termination of the contract.
Pollution Prevention	<ul style="list-style-type: none"> It was observed during the site visit that the storm water drains are poorly maintained leading to water clogging. Also there are some tradesmen engaged in making sculptures from marble stone and refuse and waste water from their activities finds its way into the side drains thereby resulting in clogging of the side drains and water logging; Poor maintenance of the carriageway with respect to waste, debris and litter, that was observed to be scattered on the ROW edge as well as on the median in some chainages; Multi-axle vehicles ply on this road and a majority of them were cited to be parked inside the carriageway, including in the urban sections. The project does not calculate, estimate and account for the GHG emissions due to the mobile sources of transportation, based on the average number of motorized vehicles plying on the road on monthly and annual basis.
Indigenous peoples, tribes and communities	<p>NHAI PD informed that some of the land acquired was from Scheduled Tribe families, specifically the Meena community. Lack of household level land and compensation data did not allow as assessment of the proportion of tribal land acquired or the specific significance of impacts on tribal families. However, the provisions of IFC PS 7 on Indigenous Peoples and specifically on Free, Prior and Informed Consent (FPIC) and IPDP do not get triggered due to the following reasons:</p> <ul style="list-style-type: none"> No section of the project road goes through designated Schedule V areas. While the <i>Meena</i> community is a scheduled tribe, within the social context of the project, this community group is well integrated and mainstreamed and could not be considered as marginalized or vulnerable as a group, even though individual households could fall into that category, in the same manner as a family from a non-tribal family could. . Any potential economic impacts from the land acquisition on the Meena community are likely to be similar in intensity as compared to other impacted entities; Random assessment of limited available data from the various tehsils suggests that the proportion of tribal land to the total land acquired would be small. However this assessment is based on a very small sample data and is only being used to demonstrate a trend. The project will invest in community development programmes along the road, focusing on sections where there is significant land acquisition
Cultural Heritage	There are two cultural properties which were found to be on the RoW- Temple in Mohanpura village (Chainage 208.850- 208.975) and dargah located in Jamdeli (Chainage 228.860 to 229.00. These properties are already on the punch list ¹ and in case of the temple; a case is also underway in court regarding removal of property.

¹ Punch listed items are list of incomplete activities that needs to be completed as per concession agreement by JMTPL.

Criteria	Key Gaps and Issues
Community Health & Safety	The corridor of NH-11 for the Jaipur Mahua stretch was observed to be a non-controlled-access highway as it provides hindered flow of traffic, with no traffic signals, intersections or property access. However, in some stretches, the entrance and exit to the highway are not provided at interchanges by slip roads (ramps), which allow for speed changes between the highway and arterial roads. In addition, there has been no control Elimination of the sources of potential conflicts with travelers coming in the opposite direction. There is no community health and safety plan/engagement regarding road safety. Pedestrian crossings are not provided at various locations and school children were observed to be crossing the highway at various locations.

The additional infrastructure requirement for the project corridor based on the site assessment has been provided in the table below:

Description	Requirement
Underpass	The number of underpasses should be increased to about 12 from the existing 5 underpasses keeping in view the population in the affected villages as per Environmental Clearance (EC) dated 1st August 2006.
Rain Water Harvesting Structure	Rain water harvesting (RWH) system is required to be provided within 3 months from the date of receipt of EC which has not been done presently.
Noise barriers	<ul style="list-style-type: none"> Noise barriers should be provided at appropriate locations particularly in the areas where the alignment passes through inhabited areas so as to ensure that the noise levels do not exceed the prescribed standards
Saucer Drains	<ul style="list-style-type: none"> Saucer Drains to be completed in chainages falling under the punch list items.

The additional inputs required from ISC to close the gaps identified in this report have been presented in the table below:

IFC PS	Recommendation
IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> ISC needs to ensure that JMTPL through its sub-contractor obtains all the necessary permits and licenses, for e.g. CTE/CTO for Hot Mix Plant
	<ul style="list-style-type: none"> ISC needs to ensure that JMTPL develop a revised Environment and Social Management System for its operations
	<ul style="list-style-type: none"> ISC should ensure that the pending litigation on the punch list items is completed with the permission of construction of service road.
IFC PS 2 Labour and Working Conditions	<ul style="list-style-type: none"> ISC should emphasize JMTPL to appoint an EHS officer assisted by dedicated team of EHS personnel.
IFC PS 3: Pollution Prevention and Abatement	<ul style="list-style-type: none"> ISC should check that JMTPL complies by all the conditions laid down in the NOC by RSPCB.
IFC PS 4: Community Health, Safety and Security	<ul style="list-style-type: none"> JMTPL should develop CSR plan for the project and undertake CSR activities to share the project with the host community
	<ul style="list-style-type: none"> ISC should ensure that JMTPL undertakes Community Consultations for all the Cultural properties falling in the Punch Listed items prior to relocation of the property from the ROW.
IFC PS 5: Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> 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. 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

IFC PS	Recommendation
IFC PS 7: Indigenous People	<ul style="list-style-type: none"> ISC should invest in community development programmes, engaging with the project affected people along the road, with specific emphasis on sections where there was maximum land acquisition, hence maximum impacts.

The ongoing litigations with respect to the project corridor have been provided below. For the sub districts of Dausa, Todabheem, Sikrai and Mahwa, the data was not made available to ERM for review by JMTP.

Details of ongoing litigations

SN.	Sub-District	No of court cases
1	Jaipur, Bassi & Sanganer	<ul style="list-style-type: none"> 38 cases in Lower court (regarding ownership dispute and fairness of compensation 8 cases in Rajasthan High court challenging land acquisition
2	Dausa	Not Available (NA)
3	Todabheem	NA
4	Sikrai	NA
5	Mahwa	NA

Based on ERM's site assessment, review of documents and discussions with the regulatory authorities, the Project Corridor of Jaipur-Mahua stretch of NH-11 has been categorized as 'Category B' and as "Category 1: Operating roads (2 or more years)" under IFC Screening Category on the basis of the following:

- The key reason of considering this project as Category 1 is because the project road has been operational for more than 2 years as of date;
- Project Impacts:** As the road is currently in operational stage , it has limited adverse environment and social impacts as adequate measures were taken during the project design such as provisions for vehicular underpasses, service roads in the urban stretches, and speed signboards along the project corridor, though ERM has observed that these measures need to be strengthened. The land acquisition for the toll road was undertaken around seven years back and has been largely completed apart from small land parcels as discussed in the punch list. These pending land acquisition items affect the service road and drainage of the toll road and not the main toll road operations;
- The project road traverses along protected forest (defined under the Indian Forest Act as an area having limited degree of protection. In Protected Forests all activities are permitted unless prohibited stretches falling under Jaipur and Dausa districts for which forest clearance (Stage-I and Stage II) has already been obtained and Compensatory Afforestation has already been done as suggested by the MoEF. Also, based on the literature review, it was identified that the nearest wild life sanctuaries are over a distance of 60 km from the project corridor and wildlife movement in terms of

mammalian fauna is also very less near to the project corridor. The project corridor does not fall in a critically endangered habitat area.

- The project road has been in operation since September 2009 and most of the land has been handed over to JMTPL. The land acquisition procedure is complete and awards have been declared, However, physical possession is pending.. It has to be iterated that none of the pending litigations or punch list items hinder the flow of the main toll road. These issues are limited to service road, junction development and saucer drains. Furthermore, the toll road has been operational for more than five years and there is no future land acquisition plan in pipeline;
- **Extent of Impacts:** The limited social and environmental impacts are site-specific and are located within the right-of-way of the corridor of impact.
- New negative change of scope for issuance of Completion Certificate by NHA which has revoked all the punch listed items;
- Review of the accident data states that the number of fatal cases has increased from 31 in 2008 to 56 in 2013 asnd almost 19 till May this year. Monitoring by the patrolling vehicle is poor and inadequate; and
- **Management Systems:** JMTPL, although a subsidiary of an ISO certified organization, IJM, has not implemented effective management and monitoring systems at the project level. The implementation of environment management system, monitoring of the sub-contractor activities is inadequate.

1.1**BACKGROUND**

I-Squared Capital (ISC) and International Finance Corporation (IFC) are evaluating an investment opportunity within a Special Purpose Vehicle (SPV) under the name of Jaipur Mahua Toll Private Limited that has been set up for the operation and maintenance of the 110 km stretch of National Highway-11 (Jaipur-Mahua stretch) near Jaipur (hereinafter referred to as project corridor).

IJM is one of Malaysia's leading conglomerates and is listed on the Main Market of Bursa Malaysia Securities Berhad ("Bursa Securities"). Its core business activities encompass construction, property development, manufacturing and quarrying, infrastructure concessions and plantations. IJM has created a Special Purpose Vehicle (SPV) under the name of Jaipur Mahua Toll Private Limited (JMTPL) for the construction, maintenance and operation of the toll road NH-11 (Jaipur-Mahua stretch).

JMTPL was appointed as the Concessionaire in accordance to the Concession Agreement with the NHAI dated September 2005 under the Build, Own, Operate and Transfer (BOOT) model. JMTPL has completed the construction of the project and achieved the provisional Commercial Operation Date (COD) on 26 September 2009.

1.1.1***Objectives of the Study***

The overall objective of the present study is to independently evaluate the Environmental, Health and Safety and Social performance of the operational toll road and to identify gaps/ issues and improvement opportunities. The outcome of the ESDD is in the form of a detailed and time bound mitigation/ follow-up action plan to ensure compliance to the applicable reference framework. The key objectives include:

- Categorization of the Project as Category 1,2 or 3 as defined in the screening/ESDD criteria defined in the Terms of Reference and to determine the screening requirements applicable to the Project;
- Assessment and verification of the project and its key components and aspects vis-à-vis the requirements and guidelines of the applicable reference framework;
- Undertake the ESDD in line with the applicable requirements detailed in screening /ESDD criteria, which may, where applicable, include reviewing the adequacy of:
 - The Environmental and Social Impact (ESIA) process including the Environmental and Social Management Program(ESMP) to the extent available including Social Impact Assessment (SIA) and Resettlement Action Plan (RAP), if appropriate;

- The Environmental and Social management systems of the Project/ SPV to manage E&S risks and impacts on an ongoing basis in accordance with the provisions of the reference framework. Reviewing whether capacity and management structures are adequate and in place to manage environmental and social risks and impacts;
- Reviewing the adequacy of proposed designs, measures and budgets, and recommending, where required, additional actions as necessary;
- Reviewing the proposed monitoring systems and suggesting amendments as necessary;
- Based on the assessment, providing a detailed evaluation on compliance with the reference framework; and
- Developing a detailed and time bound Action Plan with follow-up and implementation plan details, parameters and outcome indicators to judge compliance to IFC Performance Standards and the Equator Principles requirements.

1.1.2 *Scope of Work*

The scope of work for the present study included the following:

- Review of the environmental, health and safety and social management systems of the project proponent, i.e. the SPV along with the role and influence of regulatory authorities, such as the NHAI;
- Review of the 109 km road stretch along with all associated facilities, such as the toll booths, control rooms, any labour/ staff accommodation, onsite maintenance units and set-up etc.;
- Status of environmental clearances and applicable permits, particularly conditions that apply during the operation phase of the project;
- Consultations with the community in the immediate vicinity and adjacent to the right-of-way (RoW) of the road as well as any directly impacted land owners during the right of way acquisition; and
- Consultations with all direct SPV employees engaged in the toll road operations along with the contracted agencies and their workers.

Specifically, the scope of work entailed to acquire information needed to understand as far as practicable the aspects as given below:

Table 1.1 *Scope of the Independent Review*

SN.	Scope Criteria	Review Coverage
1	Litigation- Full information on any outstanding litigation or notices from regulatory authorities related to environmental impacts, land/RoW acquisition, labour working conditions, occupational health and safety, community health and safety.	This aspect was assessed through review of the documents provided by JMTP and discussions with the project In charge and NHAI. Representatives of the Sub-divisional Magistrate's Office (SDO) were also called upon for readily available information.

SN.	Scope Criteria	Review Coverage
2	Other risks- Full information on any stakeholder concerns (employees, local communities, NGOs, regulatory authorities, contractors, contract workers): expressed in the public domain; through grievance mechanisms; and instances of protests or civil action related to environmental impacts, land/RoW acquisition, labour working conditions, occupational health and safety, community health and safety.	This was covered through discussions with the nearby communities, sub-contractor workers as well as the representatives like highway maintenance engineers, HR & Administration department at JMTP and Project Director (Technical) at NHAI.
3	Assessment and Management of Environment and Social Risks and Impacts- Opinion on a) an ESMS that meets the requirements of IFC PSs and applicable EHS Guidelines and b) whether an operational stage ESMP, compliant to PS has been developed and has/is being implemented; Environment, health, safety, social, and labour working condition monitoring and performance to ensure that applicable provisions of IFC PSs and WBG EHS Guidelines are being met.	Through review of the available documents, site visit of the entire project corridor, review of the available literature on internet as well as discussions with IJM and JMTP team.
4	Land and Resettlement issues- Opinion/assessment on any pending land and R&R related cases/disputes pending before courts/authority or reported Clear opinion on the risks such issues (if any) a) pose to the project and b) compliance gaps with PS 5 and c) actions required to close these gaps.	Through discussions with JMTP, NHAI & Community, review of the Land records, Project award documents provided by NHAI & LAO and the punch list items, site verification and Independent engineer reports.
5	Stakeholder/Community Engagement- Review provide opinion on operation stage Stakeholder Engagement Plan and its implementation for conformance to IFC PSs.	Through discussions with the project In-charge, community and NHAI.
6	Grievance Mechanism- Adequacy and effectiveness of a functional and effective Grievance Redress system and suggestions for improvements.	Through review of the existing systems for Grievance Procedures at JMTP and discussions with the site management and the nearby community.
7	Health & Safety- Review operational stage health & safety management system (as a part of the ESMS) and its adequacy and efficacy. Review monitoring data and provide an overall assessment on H&S performance of the project	Site Assessment and review of the Safety Plan. Discussions with the maintenance workers.
8	HR/ Contractor Management- Comment on the HR/Contractor management system/practices of the project and its compliance levels to PS 2 requirements. Key issues and gaps and suggestions to close these gaps; Assessment of Labour and employee accommodation and whether they meet PS2 provisions	Review of the existing documents like HR Manual, JMTP GMC Policy, JJMTP GPA Policy, JMTP Gratuity cap Gold Policy, JMTP Gratuity Policy, Organizational Chart, Professional Tax for AP, provident Fund Calculations, recruitment procedure, Resignation procedures, TDS (IT) Employee Calculations.
9	Pollution Prevention- Adequacy of Mitigation measures implemented for impacts from air/noise/vibration in accordance with PS3 and WBG EHS Guidelines. Review monitoring data and indicate compliance levels with aforesaid standards/guidelines	Through site assessment and sensitivity mapping done using GPS and plotting of all the environmental and social features along the project corridor on both LHS and RHS and through review of limited information available in the EIA report, review of the Environmental Management Plan (EMP) for the construction phase

SN.	Scope Criteria	Review Coverage
		and Policies of IJM at the corporate level.
10	Natural Habitats- Whether the project involved forest land diversion or the route fell in the vicinity of coastal areas or large wetland areas; Based on review of literature, meetings with forest department and anecdotal information from communities provide opinion on presence or migration of any IUCN or nationally specified vulnerable, endangered or critically endangered species. If present, assess/establish whether critical habitat or not. If critical habitat, establish that CR related measures in accordance with PS 6 are in place. If not critical habitat, provide an assessment of impact on natural habitat and whether meeting natural habitat requirements of PS6 in place measures.	Through review of the EIA, Site Assessment, Review of all Forest department related correspondences and permissions and available secondary literature.
11	Indigenous peoples, tribes and communities- If road passes through scheduled areas, review process of land take in detail to understand impact on IPs, if any and whether they have been mitigated in accordance with PS7. If significant tribal population in the vicinity of the road, or significant tribal land taken or potential for loss of access to lands/resources on which tribal population dependent, assess if mitigation measures developed and implemented in accordance with PS7. Establish: no adverse impact (either historical or residual) on lands and resources under traditional or customary use of IPs (including access related impacts); no relocation of IPs from land and resources under traditional or customary use; and no adverse impact on critical cultural heritage of IPs.	Through review of available literature about the project area, discussions with the site management, site Assessment and discussion with the local community.
12	Cultural Heritage- If issues relating to cultural heritage identified at (1) and/or (2), review in detail to establish if measures implemented meet PS1 and PS8.	Through Site Assessment and review of documents provided by JMTPL.

**Source: IFC's Terms of Reference and Proposal*

1.2 APPROACH AND METHODOLOGY

1.2.1 Project Inception

An initial inception meeting with IFC and ISC was undertaken in Delhi in July 2014 in order to obtain an overview of the project status, present ERM's scope of work and align the approach, expectations and timelines.

1.2.2 Documentation Review

ERM commenced the assessment with a desk-based review of documentation ahead of the detailed site assessment which primarily focused on the Concessionaire Agreement between NHAI and JMTPL, Detailed Project Engineering Reports, As Built Drawings, the Independent Engineer Reports and Correspondence; Final Environment Impact Assessment (EIA) Report and Resettlement Action Plan (RAP), Corporate level documentation, systems and processes; regulatory compliance documents such as Environmental Clearance letter, Forest Clearance Letter, Sub- contractor Agreements,

Simultaneously, ERM undertook review of available public information on the Jaipur-Mahua Corridor of NH-11. ERM conducted a search of defined online and publicly available sources of information (relevant to the jurisdictions in which the Project corridor is located), with the objective of identifying and reporting performance issues pertaining the interest and concern to key third party stakeholders such as major non-governmental organisations (NGOs), and other interested parties. Following are the documents that were reviewed by ERM before and during site visit as part of the present study:

Project details and Agreements

- Concession Agreement Volume 1-3;
- EPC Agreement with IJMII;
- State Support Agreement JMTPL
- Documents related to completion certificate including Punch List locations;
- JMTPL Detailed Project Report;
- Project Design and details;
- Monthly Progress Reports; and
- Toll Operations and Patrolling Agreement.

Environment, Health and Safety

- Environment Impact Assessment Report and Resettlement Action Plan (EIA& RAP) prepared by Consulting Engineers Group (CEG) Limited in September 2003;
- Environment Management Plan dated 2006;
- Forest Clearance dated 2007;
- MoEF Approval letter dated 2005;
- Project Safety Plan; and
- Year Wise Accident Details.

Human Resources and Labour

- HR Manual;
- Group Medical and Accident Policy;
- Minimum wages as applicable from 1st April 2014, Rajasthan State
- Minimum wage provided to security personnel June 2014.
- Gratuity Policy;
- Organisation Chart;
- Employee Salary list;
- Provident Fund Calculations;
- Recruitment Procedures;
- Harassment Policy Circular;
- TDS calculations;
- List of contractors – maintenance, security, toll operations, labour
- Labour Licenses;
- Contractor Agreements and Terms & Conditions;

- Work order Terms & Conditions.
- Wage Register
- PF Challahs
- Insurance policy

Land

- 3D Gazette Notification for land acquisition issued dated October 25, 2007 for villages Jhar, Khori, Mangarh Khokhala, Bassi, Kanota, Manjihahal, Badcharnawas, Shyampur, Dudhlin under Jaipur District;
- 3D Gazette Notification for land acquisition issued dated 18th Feb, 2010, Jatwara, Gothda, Jhar, Bassi, Mohanpura, Filson Biharipura, Jamdoli;
- 3D Gazette Notification for land acquisition issued dated 9th April 2010 for Bawanpada, Sanwas, Bhojpura, Basda, Kheda Paharpur and Pipalki for Dausa District;
- 3D Gazette Notification for land acquisition issued dated 30th Nov 2009, for Mitrapara, Kalako, Kandoli and Bhandarej of District Dausa;
- 3D Gazette Notification for land acquisition issued dated 25th Oct 2007 for Dausa Kala and Dausa Khurad, District Dausa
- 3D Gazette Notification for land acquisition issued dated 25th Oct 2007 for Dausa Khurad, Chak Dausa, Jeerota Khurad and Bhandana of district Dausa;
- Correspondence related award for Todabheem district Karauli: Main Award declared for village Karanpur, Patoli, Anterheda & Dantli dated 29th Jan 2007 and supplementary award for govt. land dated 14th March 2007 for total 51013 sqms of Land (37604 sqms govt. land);
- Declaration of Awards vide letter F1/2006/LAO/SDM/219 dated 19 March, 2007 (village Laxmipura, Jatwara, Gotda, Malihala, Khori, Jhar, Duhalin, Baadchanawas, Syampur, Sujanpura, Mohan Pura, Bassi, Filsan Bihari Pura, Mangad Khokhawala, Kanota, Baghrana, Jamdoli Paldi Meena) district Jaipur for 776296 sqms (Private land 638175.55 & Govt land 138120.45 sqms) .
- List of encroachments prepared by JMTPL.

Legal

- Pending Claims between JMTPL and NHAI;
- Avenue Plantation litigation; and
- Utility Shifting Stay Order.

Independent Engineer

- Inter-Continental Consultants and Technocrats Ltd (IC)IC Contract for consultant services;
- IC Invitation letter; and
- IC O&M Report January to June 2014.

Traffic and Revenue

- JMTPL Toll Collection Monthly Report 2008-2013;
- IC and NHAH Approval for Toll Rates;
- Toll Rates 2008-09; 2009-10; 2010-11; 2011-12; 2012-13;
- Toll Traffic and Revenue-month wise;
- JMTPL Traffic Report 2013; and
- JMTPL Traffic Study Report by Halcrow 2008.

Work Orders and Contracts

- Tolling System;
- List of contracts/work order 2014;
- Routine Services and Maintenance;
- Shriram Enterprises LOA &RM; and
- Work order for Security services.

The documentation review was an ongoing process of the assignment where the project proponents made information available through a virtual data room. Annexure A provides the list of documents that were made available as well as pending documentation that could not be accessed.

1.2.3

Site Assessment

ERM's team of Environmental and Social experts undertook a site assessment of the project corridor of Jaipur to Mahua stretch of NH-11 from 23rd to 25th July 2014. The key aspects of the site assessment included:

- Site Assessment of the entire project corridor from Jaipur to Mahua stretch, Administrative Block of JMTPL at Rajadhok Toll Plaza and Hot Mix Plant, and discussions with the SPV (JMTPL) at site;
- Environmental & Social Sensitivity Mapping along the entire project corridor was undertaken by way of a drive-through along the entire project road stretch and mapping of features on both left hand side and right hand side of the corridor;
- Site Assessment of the Hot Mix Plant situated approximately 3 km away from the centreline of the project corridor and discussions with the contractor workers ;
- High level discussions with the government officials of National Highway Authority of India at their Project Director's Office at Dausa and JMTPL's Management Team; and
- Stakeholder consultations near villages Paldi Meena (near Dargah), Bhagrana and Kanota along the Project corridor as well as consultations with the maintenance workers.

The second site assessment was carried out on the 4th and 5th of September to collect information pertaining to the litigations related to land acquisition that

are pending in the project area and discussions were also carried out with LOA's representative (Jaipur, Bassi , Sanganer and Dausa) .

The subsequent table illustrates the key site assessment activities and details of stakeholder consultations undertaken:

Table 2.2 *Site Assessment Activities*

Date	Location	Activities
23 rd July 2014	Jaipur (Km 228)	<ul style="list-style-type: none"> • Site Visit from Jaipur-end Point at Km 228 and proceed towards Rajadhok Toll Plaza; • Discussions with the Project Manager at JMTPL's Project Office; • Discussions with the HR Manager, Compliance Manager at JMTPL; • Site assessment from Rajadhok to Sikandra Toll Plaza.
	Paldi Meena	<ul style="list-style-type: none"> • Community consultations with affected community near Dargah
	Kanota	<ul style="list-style-type: none"> • Discussion with some Bitumen Overlay workers; • Discussion with workers in the Railway Overbridge (ROB) maintenance • Community consultations with shop keepers
24 th July 2014	Kanota -At Hot Mix Plant	<ul style="list-style-type: none"> • Visit to the Hot Mix Plant; • Assessment of the Hot Mix Plant; • Discussions with the contractor workers
	Bhagrana	<ul style="list-style-type: none"> • Community consultations with affected community
	Kanota	<ul style="list-style-type: none"> • Discussions with the median maintenance and ROW maintenance workers
	JMTPL's office at Rajadhok Toll Plaza	<ul style="list-style-type: none"> • Pending Documents collection from JMTPL office; • Discussions with Head- Mr. Sunil Kumar of IJM- JMTPL
	Sikandra Toll Plaza to Mahua Project End	<ul style="list-style-type: none"> • Continue with the Project road assessment from Sikandra Toll Plaza up till Mahua at project end point for both LHS and RHS
25 th July 2014	NHAI, Dausa	<ul style="list-style-type: none"> • High level discussions with NHAI-PD , Mr. Sanjay Kumar
25 th July 2014	JMTPL Office at Rajadhok Plaza	<ul style="list-style-type: none"> • Collection of the remaining documents on land data
4 th September 2014	Jaipur LA office	<ul style="list-style-type: none"> • Meeting with Reader LAO • Meeting with then concerned person from JMTPL looking after LA for Jaipur • Information Meeting with then then concerned person from JMTPL looking after LA for Dausa, Sikrai, Todabhim & Mahwa • Meeting with documents in charge • Document review with respect to LA (files incoming and outgoing from year 2006-7-8) • Meeting with officiating project in charge.
5 th September 2014	Dausa district	<ul style="list-style-type: none"> • Meeting with Reader LAO Jaipur • Visit to PIU Dausa NHAI • Meeting with SDO/SDM Dausa • Telephone discussion with Reader/LAO Dausa • Document review with respect to LA (files incoming and outgoing Meeting with officiating project in charge

Further additional third site visit to project site was carried out from 26th to 28th sept 2014, to undertake the joined field verification of encroachments (list provided by JMTPL) all along the entire road stretch. Community consultations were also carried out to establish possible reasons for such encroachments. Detailed observations are presented in section 3.5.2, table 3.10 and *Annexure B*

Annexure A illustrates photo documentation highlighting some of the issues as have been included in this report.

1.2.4

Analysis

Project Categorisation

As part of the due diligence process, a Project Categorisation was carried out to review JMTPL's expected social and environmental impacts. The project categorization has been completely based on the ESDD/Screening Criteria provided in the TOR suggested by ISC/IFC. This categorisation is used to reflect the intensity of impacts and to specify IFC's institutional requirements and has been discussed in details in *Section 5*.

Gap Assessment

The description of gaps as per the applicable standards has also summarised the key issues that represent risks and are to be prioritised either because of potential for regulatory action; potential for reputational implication; and potential to delay the project schedule. To the extent feasible, the qualitative assessment has demarcated items/gaps that are within JMTPL's sphere of influence as well as aspects that are wrested with external authorities such as NHAI.

Action Plan Development

The format of the ESAP has been organised to capture: (a) Summary of recommendation; (b) Resources and Responsibilities; (c) Timeline for completion and (d) Indicator of Completion. This approach was used to illustrate the key standards that were met, met with non-material gaps and not met due to fundamental gaps.

Note: The present project has a list of punch list items which are pending due to litigation involved in the land requirement at certain stretches where the service road is still pending and where land is not made available by the competent authority (LA) to the Concessionaire (JMTPL). The items have been discussed in detail in Section 4. However, based on the IC letter No 2257, dated 21.10.2014, it is understood that the punch list items have been cancelled and a negative change of scope has been levied on the company for issuance of project completion Certificate from NHAI and considering the fact that the land was not made available to the Concessionaire.

1.3 *LIMITATIONS*

This due diligence exercise has been strictly undertaken based on the limited documents made available by JMTPL, consultations with NHAI, information available in public domain. The other constraints with respect to the assessment are as follows:

1.3.1 *Information Gaps*

- The project road has been operational since 1st April, 2008; therefore on account of a temporal gap in land acquisition, the existing status of issues around economic and physical displacement are not evident for onsite verification and have thus been presented on the basis of information extracted from discussions and documentation;
- Reportedly most of the project related staff of the SPV and NHAI who have worked during the construction stage have been transferred and therefore information with respect to impacts during construction stage could not be assessed.
- The information on litigations was available for punch list items and ongoing legitimations for Jaipur district. The information for district Dausa was not available.

Professional judgements expressed herein are based on facts and information provided. Wherever ERM has not been able to make a judgement or assess any process, it has highlighted that as an information gap and suggested a way forward.

1.3.1 *Uses of the Report*

ERM is not engaged in consulting or reporting for the purpose of advertising, sales promotion, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. Client acknowledges this report has been prepared for their and their clients' exclusive use and agrees that ERM reports or correspondence will not be used or reproduced in full or in part for such purposes, and may not be used or relied upon in any prospectus or offering circular. Client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this assessment and report will mention or imply the name of ERM.

Nothing contained in this report shall be construed as a warranty or affirmation by ERM that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental or social liability.

1.4 LAYOUT OF THE REPORT

<i>Section 1(this section):</i>	Introduction to the Project, Scope of the Independent Review & Approach and Methodology for the study;
<i>Section 2:</i>	Applicable Reference Framework & Regulatory Status;
<i>Section 3:</i>	Project Description;
<i>Section 4:</i>	Environmental and Social Profile of the Project;
<i>Section 5:</i>	Gap Assessment to the Applicable Standards; and
<i>Section 6:</i>	Environmental and Social Action Plan (ESAP).
Annexures	
<i>Annexure A:</i>	Photo documentation
<i>Annexure B:</i>	List of Verified Encroachments of Jaipur-Mahua corridor

This section summarises the Applicable Standards that are being used as the reference framework against which the ESDD for the Project road corridor of Jaipur –Mahua Stretch of NH-11 has been undertaken. The outcome of this study is to assess compliance with respect to the following applicable reference framework:

- Revised IFC Performance standards 2012 as interpreted and applied through screening criteria as follows:
 - Category 1: Operating roads (2 or more years);
 - Category 2: Operating roads (1 or more years but less than 2 years); and
 - Category 3: Just operational (less than 1 year) or where there is any pending Land Acquisition (LA)
- Applicable World Bank Group/IFC EHS Guidelines, Specifically, the following World Bank Group EHS Guidelines, published on April 30, 2007:
 - IFC EHS General Guidelines ;
 - IFC EHS Guideline for Toll Roads;
- Equator Principles, June 2013; and
- Applicable local, national and international environmental and social legislation

2.1.1 IFC Performance Standards

Based on a review of the Project, the following IFC Performance Standards (2012) were found to be applicable to the project:

Table 2.1 *Applicability of IFC Performance Standards, PS 1 to PS 8*

SN.	IFC Performance Standards	Applicability to the Project
1.	PS 1: Assessment and Management of Environmental and Social Risks and Impacts	Applicable This PS assesses the existing social and environmental management systems that are prevailing within JMTPL and to identify the gaps with respect to them in terms of availability of ESMP, a defined EHS Policy, organization chart with defined roles and responsibilities and risk identification procedures.
2.	PS 2: Labour and Working Conditions	Applicable This PS assesses the rights of the workers, working conditions, fair treatment, child and forced labor and rights of the migrant work force working for JMTPL as well as their sub-contractors.
3.	PS 3: Resource Efficiency and Pollution Prevention	Applicable This PS identifies the various environmental aspects along the project corridor, their compliances towards the conditions stipulated in the EC and NOC obtained from MoEF and RSPCB respectively and the existing mitigation measures that have been provided.

SN.	IFC Performance Standards	Applicability to the Project
4.	PS 4: Community Health, Safety and Security	<p>Applicable</p> <p>This PS identifies the various community healths and safety related risks due to the project and includes evaluation of mitigation measures provided at the road like signages, road crossings at schools and hospitals.</p>
5.	IFC PS 5: Land Acquisition and Involuntary Resettlement	<p>Applicable (under specific conditions)</p> <p>This PS requires a project to consider various processes and systems to avoid /minimise social and economic impacts related to land acquisition and resettlement.</p> <p>The toll road has been operational for more than five years and there is no additional land acquisition plan in pipeline. Reportedly the process of Land acquisition was initiated from 2005 up till 2010 and the land has been acquired under appropriate sub-sections of NH act 1956. And R&R of project affected persons was done as the provisions of NH Act 1956. It is understood that the NH Act does not recognises encroachers and squatters as legitimate entitled persons under its ambit. Currently most of the land is handed over to the JMTPL for the construction and in year 2008 and 2009 provisional COD has been issued. . Based on the IC letter No 2257, dated 21.10.2014, it is understood that the punch list items have been revoked and a negative change of scope has been levied on the company for issuance of project completion Certificate from NHAI. Punch list items have been excluded, land has been acquired though some structure remain on account of legal disputes .</p>
6.	IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<p>Not Applicable</p> <p>The project road traverses along Protected forest (defined under the Indian Forest Act as an area provided limited degree of protection. In Protected Forests all activities are permitted unless prohibited and a small patch of forest land stretches falling under Jaipur and Dausa districts for which forest clearance (Stage-I and Stage II) has already been obtained and Compensatory Afforestation has already been done as suggested by the MoEF. Also, based on the literature review, it was identified that the nearest wild life sanctuary is approximately over a distance of 60 kms from the project corridor and wildlife movement in terms of mammalian fauna is also low near to the project corridor. The project corridor does not fall in a critically endangered habitat area. Thus PS 6 is not applicable to the present project as the road does not affect critical habitats and there are no endangered species present in the nearby area as also specified in the EC.</p>
7.	PS 7: Indigenous Peoples	<p>Not Applicable</p> <p>The provisions of IFC PS 7 on Indigenous Peoples do not get triggered due to the following reasons:</p> <ul style="list-style-type: none"> • No section of the project road goes through designated Schedule V areas. • While the <i>Meena</i> community in the project area is a scheduled tribe, within the social context of the project, this community group is well integrated and mainstreamed and could not be considered as marginalized or vulnerable as a group, even though individual households could fall into that category, in the same manner as a family from a non-tribal family could. Any potential economic impacts from the land acquisition on the Meena community are likely to be similar in intensity as compared to other impacted entities.
8.	PS 8: Cultural Heritage	<p>Applicable</p> <p>This PS is applicable and assesses the requirements related to protection of cultural heritage, as well as benefit sharing and measures to be taken during relocation of cultural heritage structures.</p>

2.1.2 WB/IFC EHS Guidelines

The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP), as defined in IFC's Performance Standard 2: Labour & working Conditions (Occupational Health and Safety), Performance Standard 3: Resource Efficiency and Pollution Prevention.

The following EHS Guidelines were referred for the present study:

- General EHS Guidelines, 2007; and
- EHS Guidelines for Toll Roads, 2007.

2.1.3 Applicable Indian EHS and Social Regulations

Based on our understanding, the table below (*Table 2.2*) provides a list of applicable EHSS regulations along with its applicability to the Project.

Table 2.2 Applicable EHS and Social Regulations

SN.	Applicable Policies and Regulations	Institution Responsible	Objective	Applicability	Status of Permits and Licenses
1.	The Environment (Protection) Act, 1986	MoEF	Umbrella legislation to protect and improve overall Environment	<ul style="list-style-type: none"> • JMTPL needs to obtain Consent to establish and Consent to Operate for Hot Mix Plant; and • NHAI needs to obtain NOC for the project from RSPCB for being within permissible limits for Ambient Air such as PM 2.5, PM10, CO and Noise Parameters for Leq day and Night. 	<ul style="list-style-type: none"> • CTE/CTO for the Hot Mix Plant is yet to be obtained. • No Objection Certificate from Rajasthan State Pollution Control Board was obtained vide their letter No. F.12 (18-220) RPCB/G-III/364, dated 6th May 2006.
2.	The Forest (Conservation) Act, 1980	State Forest Department	Protection and conservation of Forests	<ul style="list-style-type: none"> • NHAI To obtain Forest clearance/permission of tree felling to clear the Right of Way (ROW) 	<ul style="list-style-type: none"> • Forest clearance (FC) was obtained for the entire section from Jaipur to Bharatpur on 16th November 2005.
3.	The Water (Prevention	CPCB, RSPCB	Prevention and control	<ul style="list-style-type: none"> • Consent to Establish/Operat 	<ul style="list-style-type: none"> • CTE/CTO for the Hot Mix Plant is yet to be

	and Control of Pollution) Act, 1974		of water pollution as well as restoration of water quality	<ul style="list-style-type: none"> • e to be obtained from RSPCB for Hot Mix Plant; • NOC to be obtained from RSPCB by NHAI 	<ul style="list-style-type: none"> • obtained • No Objection Certificate from Rajasthan State Pollution Control Board was obtained vide their letter No. F.12 (18-220) RPCB/G-III/364, dated 6th May 2006.
4.	Noise Pollution (Regulation and Control) Rules, 2000	CPCB, RSPCB	Noise pollution regulation and control	<ul style="list-style-type: none"> • As per the Act, ambient noise levels are to be maintained as stipulated in the rules for different categories of areas such as residential, commercial, industrial and silence zones. Considering the context of the project, JMTPL as per the conditions laid down in the NOC by RSPCB will need to abide by the limits prescribed for residential zones. 	<ul style="list-style-type: none"> • As per the Noise Rules, 2000 noise levels of 55 dBA and 45 dBA during daytime and night time respectively (for residential receptors) would require to be adhered to.
5.	The Air (Prevention and Control of Pollution) Act, 1981	CPCB, RSPCB	To prevent, control and reduce air pollution including noise pollution	<ul style="list-style-type: none"> • Consent to Establish/Operate to be obtained from RSPCB for Hot Mix Plant; • NOC to be obtained from RSPCB by NHAI 	<ul style="list-style-type: none"> • CTE/CTO for the Hot Mix Plant is yet to be obtained • NOC has been obtained by NHAI;
6.	Environmental Impact Assessment Notification, 1994	MoEF	Impact Assessment	<ul style="list-style-type: none"> • Environmental Clearance (EC) to be obtained from Expert Appraisal Committee under the Notification prior to start of Construction by NHAI • As applicable as per the EIA Notification. NHAI was responsible for 	<ul style="list-style-type: none"> • EC has been obtained by NHAI from MoEF

				carrying out the EIA study and obtaining the EC but responsibility of implementation of the EC conditions lies with JMTPL as per the Concession Agreement	
7.	The Hazardous Wastes (Management, Handling and Trans boundary Movement) Rules, 2008 as amended up to 2011	CPCB, RSPCB	Hazardous Waste Management	<ul style="list-style-type: none"> The disposal of hazardous wastes like used oil should be done as per the conditions provided in the NOC by RSPCB. 	<ul style="list-style-type: none"> NOC has been obtained ad mentions about disposing of the used oil to the recycling authority.
8.	National Highways Act 1956	NHAI	Deals with the RoW and Land Acquisition Procedure for National Highways	<ul style="list-style-type: none"> Act is applicable for the operations and maintenance of all National Highways in India. And empowers the competent authority to acquire land for the construction of National Highways. 	<p>Required notification under appropriate sub sections (3A , 3D, and 3G) has been published and compensation has been disbursed by the competent authority except certain punch list items. The total amount of compensation determined by the competent authority and disbursed by the NHAI was as follows:</p> <ul style="list-style-type: none"> Sub district Mahwa : INR 26,826,876 on 24th April 2007, Sub District Sikrai: INR 95,184,571 on 4th July 2007 Sub District Dausa: INR 29,898,499 on 4th July 2007 Sub District Todabheem: INR 12,279,983 on 28th July 2007 ; Sub District Jaipur including Bassi and Sanganer: INR 672,559,844 on 24th Aug 2008
9.	Shops and Establishment Act 1958	Labour Department	Employment Conditions	<ul style="list-style-type: none"> Indian regulatory requirement linked with working hours, leave policies, employee welfare and 	<ul style="list-style-type: none"> Registration obtained (Certificate no. AL037/HYD/368/2012) and renewed, valid till December 2014. .

				provision of basic facilities to employees.	
10.	Contract Labour Regulation Act, 1971; Building and Other Construction Workers Act, 1996	Labour Department	Contract Labour Management	<ul style="list-style-type: none"> Indian regulatory Governs applicable working conditions, facilities, required permissions from labour department etc. 	<ul style="list-style-type: none"> Labour License: Contract Labour License) of contractors were reviewed and were found to be compliant under Section 12(1) of the Contract Labour (Regulation and Abolition) Act, Inter-state Migrant Worker License: One contractor i.e. Krishna Infrastructure reported that it hires migrant labourers at times and has not obtained an Inter-state Migrant Workers' License under Section 8(1) of the Inter-state Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979.
11.	Child Labour Act, 1986 and Bonded Labour Act 1976	Labour Department	Workforce Protection	<ul style="list-style-type: none"> Indian regulatory regarding Non deployment of child labour in hazardous activities and non- deployment of bonded/forced labour of any kind 	<ul style="list-style-type: none"> No child labour and forced labour deployed by principal employer or sub-contractors as reported
12.	Minimum Wages Act, 1948; Payment of Wages Act, 1936 Equal Remuneration Act, 1976	Labour Department	Wage Payment	<ul style="list-style-type: none"> Indian regulatory for payment of wages, overtime, specific requirements for construction workers, insurance etc. 	<ul style="list-style-type: none"> Wage registers are maintained, payment of wages is done as per latest minimum wages schedule applicable from April 2014. HRA and PF are provided to contract workers
13.	Workers Compensation Act, 1923 Maternity Benefits Act,	Labour Department	Welfare	<ul style="list-style-type: none"> Indian regulatory requirement for Equal compensation, 	<ul style="list-style-type: none"> Maternity leaves are given to women employees HRA, PF, Medical and Accident insurance

	1961 Public Provident Fund Act, 1968 Employees State Insurance Act, 1948			grading structures, benefits to female employees, provision of Provident Fund and medical insurance.	provided to employees
14.	Industrial Model Standing Orders Act, 1947 Trade Union Act, 1926 Industrial Disputes Act, 1957	Labour Department	Industrial Relations	<ul style="list-style-type: none"> Indian regulatory requirement of forms of collective bargaining in form employee association, forums or trade unions and regular engagement with senior management. 	<ul style="list-style-type: none"> Trade union or any form of workers association/organisation not present

2.2

COMPLIANCE TOWARDS CONDITIONS UNDER ENVIRONMENTAL CLEARANCE AND FOREST CLEARANCE

This section reviews the status of the compliance against the conditions mentioned in Environmental clearance and Forest Clearance. The project was accorded Environmental Clearance (EC) on 1st August 2006 and NOC was obtained on 06.05.2006 from Rajasthan State Pollution Control Board (RSPCB). Based on review of the Environmental Clearance, Forest Clearance and NOC obtained for the project stretch, the following gaps have been identified:

Table 2.3 *Compliance to conditions under Environmental Clearance*

SN.	Condition as stipulated in the Environmental Clearance	Compliance Status/Gaps Observed
1.	Solid waste management plan should be provided	This plan has not been prepared by JMTPL
2.	Rain water harvesting (RWH) system should be provided to the Ministry within 3 months from the date of receipt of EC	During the site assessment, RWH structures were not observed along the road stretch
3.	The number of underpasses should be increased to about 12 from the proposed 5, keeping in view the population in the affected villages	The number of underpasses provided is as per the design and have not been increased
4.	Longitudinal drains should be provided all along the project road to ensure proper drainage of the area. In addition, adequate number of under passes and culverts to act as cross drainage structures should also be provided	Drains have been provided all along the project road however the same were observed to be clogged at number of locations.
5.	Noise barriers should be provided at appropriate locations particularly in the areas where the alignment passes through inhabited areas so as to ensure that the noise levels do not exceed the prescribed standards	Vegetative barriers are minimal, especially near to schools adjacent to the ROW.

Table 2.4 Compliance to conditions under Forest Clearance

SN.	Condition as stipulated in the Forest Clearance	Compliance Status/Gaps Observed
1.	Forest Land Use and category should not be modified	Avenue Plantation has been done as suggested by Forest Department and Diversion of forest land has been done as suggested.
2.	Tree Plantation should be done in the ratio of 2:1	Compliant
3.	Tree Plantation should be done on both the sides of the road as provided in the Forest Division Proposal	Compliant, but Avenue plantation is yet to be completed in some stretches.
4.	Environmental Clearance should be obtained based on 1994 Notification	Obtained as provided in the above table
5.	During the project construction and developmental stage, no damage and disturbance should be created to the nearby natural environment.	Compliant
6.	Compensatory Afforestation should be done as suggested by the Compensatory Afforestation, Management and Planning Agency	Compliant

Table 2.5 Compliance to conditions under No Objection Certificate obtained from RSPCB

SN.	Condition as stipulated in the Forest Clearance	Compliance Status/Gaps Observed
1.	That the management shall be liable for achieving the standards laid down in the EP Act, 1986 and relevant rules. The air pollution sources shall conform to Emission Regulations Part-I,II & IV issued by the Central Board and as adopted by the State Board	Monitoring of Ambient Air is not being carried out by JMTP.
2.	Adequate number of cross drainage works shall be provided all along the alignment so as to ensure that the natural drainage pattern of the area is not affected adversely.	Drains have been provided all along the project road however the same were observed to be clogged at number of locations. However, saucer drains are yet to be completed at some stretches which are under the litigation items.
3.	Adequate number of the underpass/culvers with sufficient width shall be provided all along the alignment to facilitate the movement of both the persons and cattle including the habituating wildlife in the project area.	The number of underpasses provided is as per the design and have not been increased. No reptile underpasses also provided.

SN.	Condition as stipulated in the Forest Clearance	Compliance Status/Gaps Observed
4.	The proponent shall ensure that adequate and sufficient noise barriers shall be provided is as to ensure that the noise level does not exceed the ambient noise levels prescribed in the Environment (Protection) Act, 1986	Vegetative or structural barriers near to schools adjacent to ROW have not been provided. These were also not identified and suggested in the EIA Report.
5.	The ground water quality should also be regularly monitored and report submitted to the State Pollution Control Board	Ground Water Monitoring is not carried out by JMTPL
6.	That the management shall achieve the standards for ambient quality in and around the area as provided in the NOC.	Compliant
7.	That proper arrangement shall be made so that following standards for noise in ambient air may be achieved with respect to noise and suspended particulate matter	Ambient Air and Noise monitoring is not carried out by JMTPL
8.	For the implementation of necessary measures as specified in the EMP, environmental management unit (EMU) shall be set up for the project.	No EMU has been set up by JMTPL for the project.

This section includes a brief description of the Jaipur –Mahua stretch of NH-11 that is under the scope of the main concessionaire, i.e. JMTPL. The description of the project is intended to provide a sense of scale of the nature and type of environmental and social impacts.

3.1

OVERVIEW

The Jaipur-Mahua road stretch of National Highway (NH) 11 connects Jaipur, Bikaner ,Fatehpur-Sikri-Agra. The length of the project road is 110 km starting from km 120.012 to km 229.100, falling across the districts of Dausa and Jaipur in the state of Rajasthan and located at a latitude from 69° 20' to 78° 17'E and longitude from 23° 30' to 30° 11'N. The location of the project road has been presented in *Figure 3.1*.

The road stretch was an undivided 2-lane throughout the section which was further widened and modernized to a 4-lane divided highway under the National Highway Development program (NHDP) Phase III.

The total land that was required for the expansion of the right of way of the project was 332.415 ha of which Protected Forest land comprised of 294.615 ha, Reserved Forest (km 226-km 226.528) comprised of 1.84 ha and irrigated land comprised of 36 ha.

The project road has one major bridge on river Dhund, 17 minor bridges and 900 culverts and 6 intersections. The number of villages through the alignment passes is 71 and affected population is 49,300 (as mentioned in the EC).

The project corridor is split into two sections based on the work being subcontracted to two parties namely:

- Maintenance Section -1 (MS1): Starting from Mahua at Km 120, including Sikandra Toll Plaza and ending at km 175 under Krishna Infrastructure; and
- Maintenance Section-2 (MS2): Starting at Km 175, including Rajadhok Toll Plaza and ending at km 228, under JMTPL.

There are truck lay by areas as per the design document, which have been provided with drinking water and toilet facilities.

As stated by the Ministry of Environment and Forests (MoEF) in the Environmental Clearance, area proposed to be afforested was 75 ha and 23,580 trees were proposed to be cut and about 70,000 trees to be planted. There are no protected/endangered species in the project area as per the available secondary information and as reported in the EIA report.

The project corridor has a Hot mix Plant approximately 3 km away from the centreline of the project corridor at km 217-216. This plant has been installed by Krishna Infrastructure for bitumen overlaying as a part of the road maintenance activities.

The project corridor has an administrative office at Rajadhok Toll Plaza. The administrative building at Sikandra Toll Plaza is yet to be constructed.

Figure 3.1 Location of Jaipur Mahua Stretch-National Highway-11



Source: Google Earth Satellite Imagery dated 4/10/2013

3.1.1

Contractors

JMTPL has engaged the following subcontractors for all the activities and maintenance of the project corridor and the list has been presented in **Table 3.1**.

Table 3.1 *List of Subcontractors for the Project road maintenance*

SN.	Name of the Contractor	Scope of Work	Number of workers involved
1.	M/s Ramprasad Kasana	Security services for Truck Layby	24
2.	M/s Yash Security Service	Supply of manpower to JMTPL	12
3.	M/s Shivam Security Services	Security service of Sikandra Toll Plaza	30
4.	M/s Vijay Ex-servicemen Welfare Co-operative Society Ltd	Security service at Rajadhok Toll Plaza	30
5.	M/s Morkoline Infra	Agreement for toll collection operations and allied services at Sikandra and Rajadhok Toll Plaza	169
6.	M/s Shriram Enterprises	Maintenance works for 1 year of NH-11 from Mahua to Jaipur	20
7.	M/s Krishna Infrastructure	Maintenance works for 1 year of NH-11 from Mahua to Jaipur	20
8.	M/s Jaisingh Gurjar	Replacement of damaged anti-glazier and painting.	Details of employees were not made available for review.
9.	M/s Vikas Construction	Supply of Labour for miscellaneous work and Ambulance services. Details of employees were not made available for review.	Details of employees were not made available for review.

Note: The breakup of permanent and temporary workers was not made available. However, it was reported that most of the contract workers in maintenance and security are temporary staff.

3.2

ENVIRONMENT AND SOCIAL MANAGEMENT SYSTEMS

IJM was formed in 1983 after the merger between three medium sized-local construction companies in Malaysia, namely, IGB Construction Sdn Bhd, Jurutama Sdn Bhd and Mudajaya Sdn Bhd. Thereafter, IJM (India) Infrastructure Limited (IJMII) is a Malaysian Multinational, which is a subsidiary of IJM Corporation Bhd.,(IJM) Malaysia and registered under the Companies Act 1956. In the present context, IJMII has created a Special Purpose Vehicle, named, Jaipur Mahua Tollway Private Limited (JMTPL), which is the Concessionaire for the Jaipur Mahua stretch of National Highway-11.

IJM has a policy statement on health, safety and Environment formulated on February 1, 2011. IJM Corporation Berhad and IJM Construction Sdn Bhd have been certified to OHSAS 18001:1999 by SIRIM on 3rd November 2000. IJM has implemented an Occupational Health and Safety management System

complying with OHSAS 18001:2007 covering the scope of provision of construction services for Building and civil Engineering Works and provision of construction services for piling and substructure engineering works and the certificate was issued on 13th January 2012 and valid up till 1st October 2014.

IJM has implemented an Environmental Management System complying with ISO 14001:2004 covering the scope of provision of construction services for Building and civil Engineering Works and provision of construction services for piling and substructure engineering works and the certificate was issued on 27th December 2011 and valid up till 1st October 2014.

IJMII has obtained the ISO 9001:2008 accreditations in June 2009 with Scope of Design & Development, Construction and Maintenance of Roads, Bridges, Townships, Residential and Commercial Buildings.

IJM has a project safety plan in place which is applicable to JMTPL. JMTPL has included this H &S plan in the contractual obligations of the EPC contractors. The project safety plan includes safety provisions and processes to be followed during construction (which is completed), maintenance of road, traffic and vehicular safety, usage of signage, road safety and speed and access control and operations and maintenance. The plan also charts out an Emergency Response Plan to be followed in case of road accidents and covers occupational health and safety aspects too. The highlights of the Plan are as follows:

- The Project Safety Plan was prepared in November 2005 and included the requirements of the construction as well as the operation and maintenance phases of the project road;
- It includes the implementation mechanism of the safety plan along with an Action Plan and the safety meetings through tool box meeting procedures to be conducted by the safety personnel and his team;
- Safety health and Security measures at the base camp, for site vehicles, heavy plant and machinery, earth works, concreting works, re-bar works, form works, hoisting works, materials storage, traffic safety management, road maintenance and safety requirements in Schedule S;
- It also includes the Emergency procedure and the flow chart for accident reporting;
- The plan describes about the safety requirements in the road maintenance through safety standards such as maintenance and provision of warning signs, traffic control devices such as barricades, cones , pylons, regulatory signs, flagmen;
- It describes about the safety management practices during normal operation through highway patrol.

3.2.1

Human Resources

JMTPL has a dedicated Human Resources Officer who sits in Rajadhok toll plaza office. The HR officer oversees employee administration and welfare

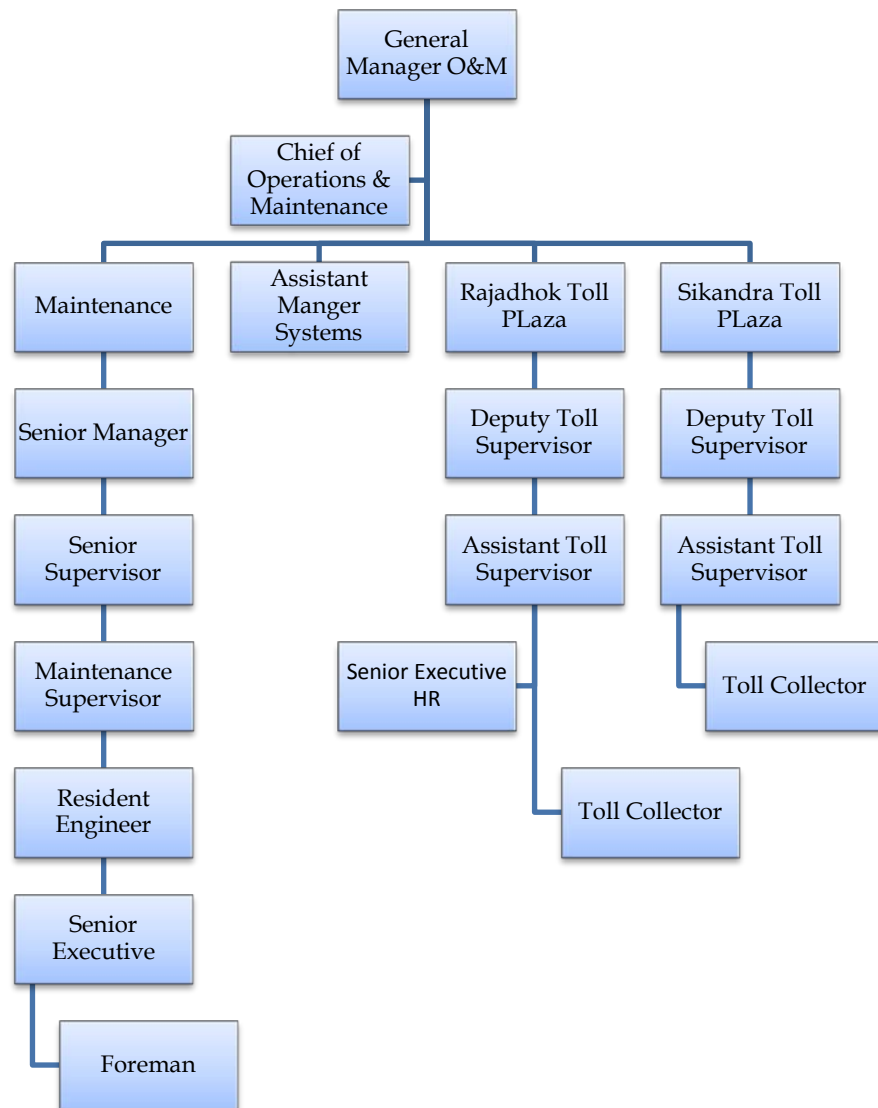
and reports to the General Manager. Morkoline, the chief O&M contractor also has one dedicated human resources officer (there is no human resources department) stationed in the contractor office located in Rajadhok office. There is no dedicated staff or department working in the area of CSR or community development and it was reported that the company is not involved in any activity linked with community interaction and development.

There are a total of 32 permanent employees working for JMTPL stationed in site office at Rajadhok, Rajasthan with six employees stationed at IJM's headquarters in Hyderabad.

3.2.2 *Organisation Structure*

JMTPL has established an organizational structure for handling safety aspects though a separate structure on Environment and Social management is absent. Site office is headed by General Manager who is responsible for all operations, administration and maintenance work. The site office is located at Rajadhok Toll Plaza and administration staff like HR, IT, Engineer as well as the toll way operator contractor- Morkoline Ltd are placed at Rajadhok Toll Plaza. The organization chart of JMTPL has been provided in *Figure 3.2*.

Figure 3.2 Organisation Chart-Site Office



Source: JMTPL

3.3 PROJECT ROAD FEATURES

The characteristic features along the project road are:

- The project road passes majorly through a plain terrain across two districts, namely, Jaipur and Dausa;
- As per the Detailed Project Report, to accommodate foot paths, barricaded service roads with central median in 4-lane carriageway, tree plantation, truck parking area with allied facilities, the ROW width of the project road is 45 m. Details of right of way of the project road has been provided in **Table 3.2**.

Table 3.2 *Detail of Right of Way*

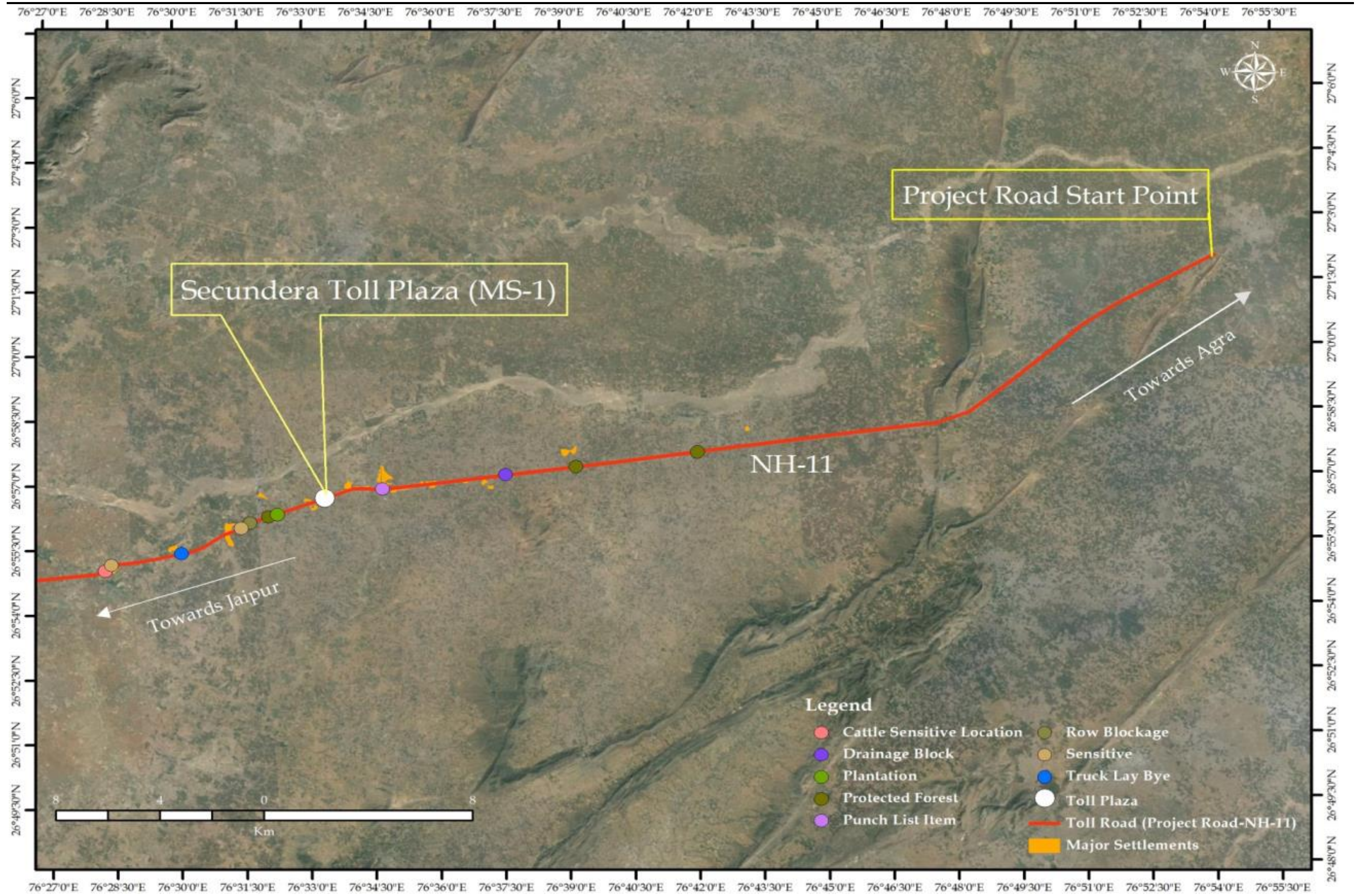
SN.	Chainage	Old existing (2-lane) ROW in Meters	Proposed ROW as per DPR in Meters
1	120-211	45	45
2	212.425-221	27	45
4	221-225.450	45	45
5	225.450-226.560	27	45
6	228-233*	10-28	45

*Source: DPR, * Land acquisition was not possible due to the presence of structures of archeological importance at Ghat ki guni.*

- Saucer drains are provided in the urban stretches but incomplete in stretches where there is pending litigation on land. This has been described subsequently;
- The project road has a 4.5 m wide median in the rural areas and a 1.5 m wide median in the urban areas with service roads in the urban areas. The saucer drains have been provided in the urban areas but are yet to be completed in some stretches where there is pending litigation from NHAI;
- A Hot Mix Plant has been set up by Krishna Infrastructure(KI), who is also the bitumen overlaying contractor. KI is also responsible for the maintenance of the MS-2 corridor section;
- The project road traverses majorly along forest land with Protected Forest land as 294.615 ha and 1.84 ha as Reserved Forest (km 226.0 to km 226.528). Combined Forest Diversion proposals for diversion of 421.815 ha (total forest land under NH-11 from Jaipur to Bharatpur) of protected forest land were submitted to the Nodal Officer at Forest Department and Additional Chief Conservator of Forest, Jaipur in 2005, out of which 294.615 ha of protected Forest Land and 1.84 ha of Reserved forest land falls in the Jaipur-Mahua stretch. Stage I Forest clearance was further obtained for the entire section from Jaipur to Bharatpur on 16.11.2005 and Stage 2 Forest Clearance was obtained on 1.09.2006; and
- There is no Wildlife Sanctuary or National Park situated within 10 km of the project corridor.

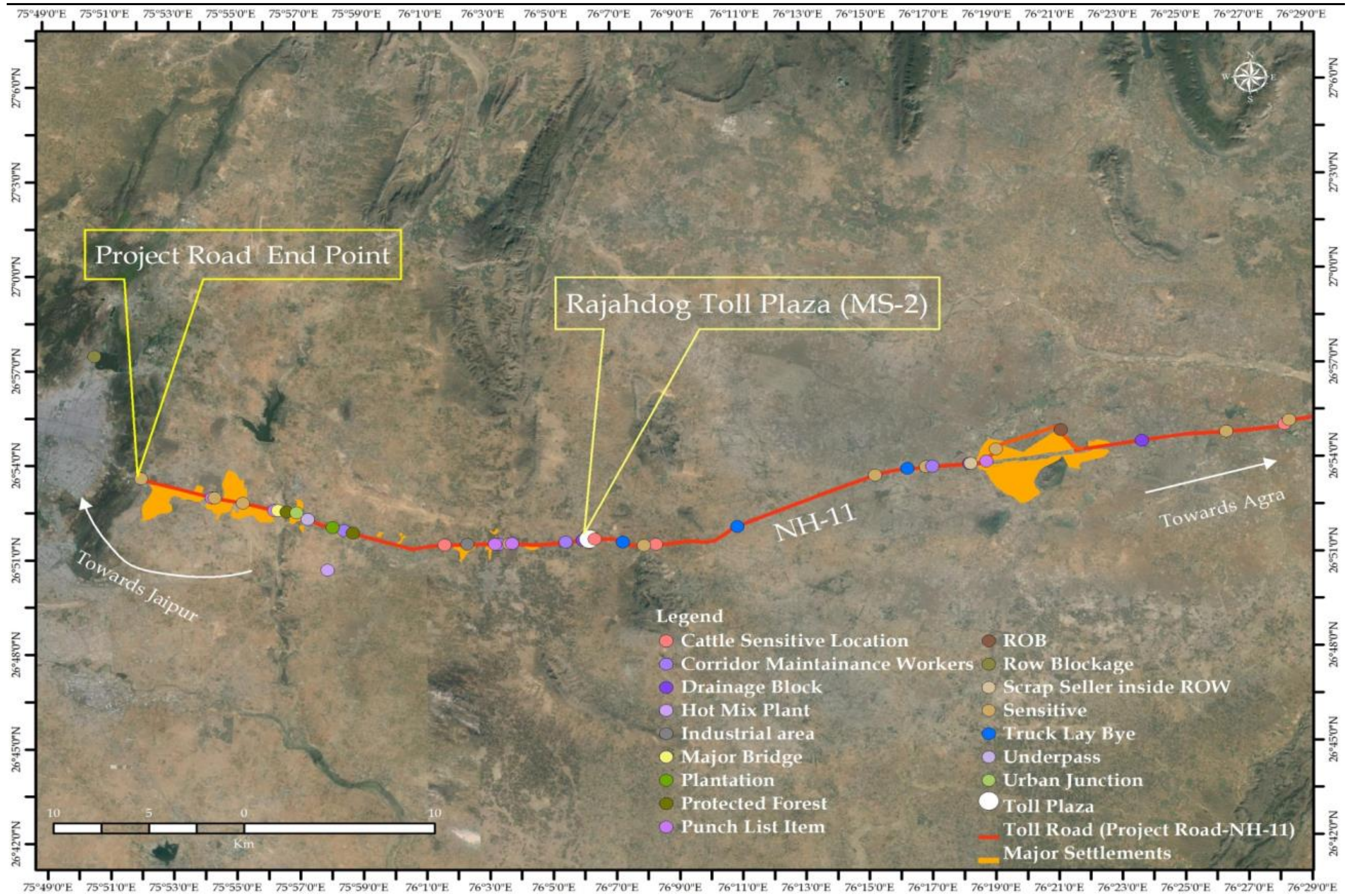
Figure 3.3 and Figure 3.4 illustrates the project footprint based on strip mapping that was developed using geographical coordinates. A summary of selective key environmental and social sensitivities along the project corridor has been provided subsequently.

Figure 3.3 Overview of the Jaipur- Mahua Project Corridor- MS-1



*Source: Adapted from Google Imagery using onsite GIS Mapping

Figure 3.4 Overview of the Jaipur- Mahua Project Corridor- MS-2



Source: Adapted from Google Imagery using onsite GIS Mapping

Figure 3.3 and Figure 3.4 provides an illustration of the environmental and social features mapping done along the project corridor.

Table 3.3 *Selective Environmental and Social features plotting along the project corridor-Jaipur –Mahua*

SN	Chainage	Description	Key Features		Structure Type	Within/ Outside ROW
			LHS	RHS		
1.	KM 228-227	Project Road Ends at Jaipur	Leprosy Hospital & Masjid	-	Permanent	Within ROW
2.	Km 224 to Km 223	Located adjacent to RoW, road crossing for school children	School	-	Permanent	Outside ROW
3.	Km 223- Km 222	Temple	Temple	-	Permanent	Within ROW
4.	Km 221- Km 220	Dhund Major Bridge	Major Bridge		Permanent	-
5.	Km 221- Km 220	Kanota Forest	Forest	-	Forest area	Outside ROW
6.	KM 220- 219	Kanota Junction	-	-	Permanent	Within ROW
7.	KM 219-Km 218	Vehicle /Cattle Underpass	-	-	Permanent	Within ROW
8.	KM 217-Km 216	Hot Mix Plant	-	Hot Mix Plant 3kms inside	Semi-Permanent	Outside ROW
9.	KM 217-Km 216	Protected Forest Stretch	-	-	Forest	Within ROW
10.	Km 212 –Km 211	Cattle Crossing Sensitive Section	-	-	Sensitivity	Within ROW
11.	Km 11-Km 10	Bassi Industrial Area	-	-	Permanent	Outside ROW
12.	Km 209-Km 208	Temple	Cultural Property	-	Permanent	Within ROW
13.	Km 207-Km 208	Temple (Punch List Item)	-	-	Permanent	Within ROW
14.	KM 205- KM 204	Marble Stone Crusher material stock	-	-	Semi-Permanent	Within ROW
15.	KM 204-Km 203	Rajadhok Toll PLaza	-	-	Permanent	-
16.	KM 204-Km 203	Vehicle and cattle Underpass	-	-	Permanent	Within ROW
17.	KM 203-202	Truck Lay Bye Area	Toilet Block		Permanent	Within ROW
18.	KM 201- Km 200	Cattle Accident Point	-	Play School	Permanent	Within ROW
19.	KM 188-187	Primary health Center-coming in RoW	-	PHC	Permanent	Within ROW
20.	Km 187-Km 186	Truck lay Bye Area	-	Toilet Block	Permanent	Within ROW
21.	Km 186-185	Temple	Temple		Permanent	Within ROW
22.	Km184- Km 183	Marble Craftsmen	-	-	Semi-	Within

SN	Chainage	Description	Key Features		Structure Type	Within/ Outside ROW
			LHS	RHS		
					Permanent	ROW
23.	Km 183-Km 182	Scrapseller on RoW	-	-	Semi-Permanent	Within ROW
24.	KM 182.725	Punch List Item	-	-	Permanent	Within ROW
25.	KM 179-178	ROB	-	-	Permanent	
26.	Km 174-Km 173	Marble Craftsmen, Choked Drainage	-	-	Semi-Permanent	Within ROW
27.	KM 170- Km 169	School children crossing in the wrong direction to the opposite road	School	-	Permanent	Within ROW
28.	Km 164-Km 163	Truck lay Bye	-	-	Permanent	Within ROW
29.	KM 161-Km 160	PHC at Doobi	-	PHC	Permanent	Within ROW
30.	KM 160 -Km 159	Protected Forest Stretch-Eucalyptus Plantation		PF	Forest	Within ROW
31.	KM 157	Sikandra Toll Plaza	-	-	Permanent	
32.	KM 154+474	Punch List Item Junction development	Pending Junction development	-	Permanent	Within ROW
33.	KM 149+625	Marble Craftsmen drainage block	Marble Craftsmen	-	Semi-Permanent	Within ROW
34.	KM 146+500	Protected Forest Stretch	Protected Forest	-	Forest	Within ROW

Source: Based on GPS Plotting through Site Assessment

Based on the above sensitivity mapping and documents review, Section 4.2 describes the observations and gaps identified pertinent to environmental and social aspects.

3.4 ACCIDENT/INCIDENT ANALYSIS

Based on the review of the accident analysis register since 2008 shows the following data:

Table 3.4 Review of Cumulative Accident Report from March-08 to May 14

SN.	Year	Details of Accident victims			Total Persons effected	Number of Accidents			No of persons admitted in Hospital
		Fatal	Serious Injury	Minor Injury		Major	Minor	Total	
1.	2008	31	50	113	194	52	43	95	186
2.	2009	33	75	166	274	64	77	141	277
3.	2010	35	186	228	451	122	64	185	419

SN.	Year	Details of Accident victims			Total Persons effected	Number of Accidents			No of persons admitted in Hospital
		Fatal	Serious Injury	Minor Injury		Major	Minor	Total	
4.	2011	43	140	146	329	68	44	110	253
5.	2012	50	51	209	310	68	64	139	179
6.	2013	56	146	165	367	86	49	135	307
7.	Till May 2014	19	48	66	133	26	21	47	133

Source: SPV-JMTPL

Based on the above table, it is understood that there has been a significant increase in the number of accidents over the years from 2008 to 2013 and with almost 133 cases till May 2014 this year. This might be also due to the result of the following observations:

- Significant number of multi-axle vehicles parked in the corridor on both sides outside the Truck-lay bye space, thereby reducing the road width for traffic movement;
- Significant number of vehicles driving in the opposite direction on the main expressway, for e.g., tractors with bricks and marble stones, motorcycles, buses, JCB moving in the opposite direction etc;
- School children crossing the road at significant chainages, but no signboards for such crossings have been provided. The Project Safety Plan requires that three kind of maintenance signages to be provided, viz. regulatory signs, warning signs and guide signs; and
- Highway patrolling is not adequate as the response time during any emergency is more than 15 minutes.

Also, ERM did an assessment of the public literature available on the website of Transport Department of Rajasthan. Based on the review of the Road Accident data of the National Highways in the state of Rajasthan from the year 2007 to 2013, the following analysis has been provided.

Table 3.5 Trends of Annual Road Accidents-National Highways in Rajasthan

SN.	NH no	Length (km)	Year			Year 2011			Year 2012		
			No. of Accidents	Deaths	Injuries	No. of Accidents	Deaths	Injuries	No. of Accidents	Deaths	Injuries
1	N.H. No. 3	3	9	35	127	75	31	112	95	64	111
2	N.H. No. 8	688	1978	900	246	1867	859	2162	1758	922	2057
3	N.H. No. 11	531	1288	622	1585	1260	623	1490	1169	556	1562
4	N.H. No. 11 (A)	14	10	30	127	90	32	131	91	30	120
5	N.H. No. 11	-	0	0	0	3	2	4	2	1	2
6	N.H. No. 11 (B)	1	5	27	6	105	45	201	109	35	138
7	N.H. No. 12	400	1080	375	1421	962	292	1271	839	290	1090
8	N.H. No. 14	31	52	249	872	550	262	847	426	231	699
9	N.H. No. 15	90	38	263	513	392	239	522	328	243	525

SN.	NH no	Length (km)	Year			Year 2011			Year 2012		
			No. of Accidents	Deaths	Injuries	No. of Accidents	Deaths	Injuries	No. of Accidents	Deaths	Injuries
10	N.H. No. 65	40	35	223	553	347	210	401	377	234	427
11	N.H. No. 76	48	59	291	774	484	238	621	540	249	704
12	N.H. No. 79	22	48	265	601	421	237	564	409	217	633
13	N.H. No. 79 (A)	3	3	16	3	54	28	55	50	22	45
14	N.H. No. 89	30	15	98	283	184	164	234	200	158	230
15	N.H. No. 90	1	5	18	7	59	17	101	56	13	2
16	N.H. No.112	34	14	105	138	191	100	169	214	154	217
17	N.H. No.113	20	10	40	211	135	55	222	162	59	260
18	N.H. No.114	1	6	42	7	61	51	114	65	2	83
19	N.H. No.116	8	2	16	8	33	8	76	26	7	7
	Total		7520	3615	9998	7273	3493	9297	6916	3537	9022

Source: Transport Department, Road Statistics Data, Rajasthan

Out of all the National Highways traversing in the state of Rajasthan, NH-8, NH-11 and NH-12 show significant occurrence of accidents over the years 2010, 2011 and 2012. However, the present project road is NH-11 which originates from Jaipur and ends at Bikaner reported number of accidents as 1288 in 2010, 1260 in 2011 and 1169 in 2012. Moreover, review of the data provided by JMTPL, as presented in **Table 3.4**, shows that in NH-11 (Jaipur-Mahua stretch), the number of accidents in 2008, which increased to 185 in 2010 and thereafter decreasing to 135 in 2013 and 47 till May this year. However, the number of fatal cases has increased from 31 in 2008 to 56 in 2013 and almost 19 till May this year.

3.5

LAND REQUIREMENT

The available Right of Way (ROW) before the construction of the proposed road varies from 27 m to 45 m respectively. Based on the technical and safety standards suggested by Indian Road Congress (IRC), the typical cross sections have been designed to fit the proposed road within the available ROW. The additional requirement of land for ROW deficiency and other associated facilities was acquired through appropriate sub sections of NH Act 1956.

Based on the available information, village wise details of 88.68 Ha of acquired land is given in **Table 3.6**. The remaining details of 241.93 Ha was not made available by NHAI and JMTPL.

Table 3.6 Villages from which land was acquired

Village	Area acquired in sq. m	Tehsil	District
Jamdeli	20845	Jaipur	Jaipur
Baghrana	56278	Jaipur	Jaipur

Village	Area acquired in sq. m	Tehsil	District
Paldi Meena	37416	Sanganer	Jaipur
Lakshmipura	16953	Bassi	Jaipur
Jatwada	47431	Bassi	Jaipur
Gothada	26989	Bassi	Jaipur
Malihala	4301	Bassi	Jaipur
Khori	39587	Bassi	Jaipur
Jhar	26700	Bassi	Jaipur
Badh Chaarnavas	8727	Bassi	Jaipur
Shyampura	8349	Bassi	Jaipur
Dudhli	15302	Bassi	Jaipur
Sujanpura	30988	Bassi	Jaipur
Mohanpura	43005	Bassi	Jaipur
Bassi	111946	Bassi	Jaipur
Mansar Kheri	83232	Bassi	Jaipur
Philsan Biharipura	2024	Bassi	Jaipur
Mangarh Khokhawala	50089	Bassi	Jaipur
Kanota	146315	Bassi	Jaipur
TOTAL (A)	7,76,296 (77.62 ha)		
Dausa Khurd	15930	Dausa	Dausa
Chak Dausa	100	Dausa	Dausa
Jeerota Khurd	1935	Dausa	Dausa
Bhandana	41486	Dausa	Dausa
Dausa Kalan	400	Dausa	Dausa
TOTAL (B)	59,851 (5.98 ha)		
Karanpur	19190	Todabheem	Dausa (formerly in Karauli)
Patoli	13320	Todabheem	Dausa (formerly in Karauli)
Antarhera	14798	Todabheem	Dausa (formerly in Karauli)
Dantli	3305	Todabheem	Dausa (formerly in Karauli)
TOTAL (C)	50,613 (5.06 ha)		
GRAND TOTAL (A+B+C)	8,86,861 (88.68 ha)		

Source: Awards letter dated March 9, 2007 and Gazette Notification

Note: Details of remaining parts of Dausa district near Sikandra which fall in Sikrai Tehsil were not available for review.

Box 3.1 *Inconsistency in data regarding Land*

There is an inconsistency in the figures of total land required for the project. Although as stated in EC project requires total 330.615 Ha of land. Out of which chainage wise breakup is available for 17.433 Ha, village wise breakup is for 88.68 Ha and tehsil wise breakup of total compensated land is 83 Ha and district wise breakup 77.62 ha. The information on land is extracted from the available gazette notification, award and EC letter. It is understood after getting the complete information the figures for total acquired land and compensation is likely to be changed and would be consistent.

3.5.1 *Land Acquisition Process for the JMTR Project*

The land acquisition process was initiated in 2005 and gazette notification u/s 3D (NH Act 1956) for a significant portion of the land was published in year 2007. Accordingly u/s 3G the award was decided in year 2007-2008. As per the Detailed Project Report September 2003 (DPR), nearly 155 Residential, 285 commercial and 270 Residential cum commercial structures were affected. 5 educational, 3 govt. building and 29 religious structures and 248 boundary

wall were also affected due to land acquisition. Sub district wise details of compensation for land and assets are given in *Table 3.7* below:

Table 3.7 Sub district wise details of compensation for Land and assets

SN.	District	Sub District	Total Compensation sanctioned as per Award in INR	Date of release of payment to CA by NHAI
1	Dausa	Mahwa	2,682,687	24 th April 2007
	Dausa	Sikrai	91,584,571	04 th July 2007
	Dausa	Dausa	29,898,499	04 th July 2007
	Karauli	Todabheem	12,279,983	28 th July 2008
	Jaipur	Jaipur, Bassi, Sanganer	672,559,844	24 th Aug 2007

3.5.2 *Site Observations*

Right of Way

- It was observed that the carriage way is free from encumbrances however there are temporary squatting/encroachments along the services roads especially in urban settlements such as shops, food stalls, informal settlers were living adjacent to the toll road near dargah;
- Apparently it appears that ROW near road side restaurants/Dhabas and small commercial units (stone cutting activities) are encroached upon by creating access and dumping of the raw materials etc.;
- Further the PD NHAI has reported that the land mutation and updating the land records and maps is yet to be undertaken;
- The complete set of documents related to land acquisition could not be made available for review. However the copy of award declaration for Sub District Jaipur, Sanganer and Todabheem and supplementary 3A & 3D notification for Dausa was given to ERM for Review;
- Reportedly the land acquisition process was initiated around 2005 and carried up to 2010 therefore most of the responsible field staff have been either demobilized or transferred to their respective department hence the process history of land acquisition process as this stage was difficult to be documented;
- However, based on the IC letter No 2257, dated 21.10.2014, it is understood that the punch list items have been revoked and a negative change of scope has been levied on the company for issuance of project completion Certificate from NHAI. . The non-acquired parcels do not affect the operations of the toll road however there may be safety risks as service roads get blocked at these locations. Further the liability of construction of the service road lies with JMPTL until it is negatively scoped out of their concession agreement. At present, NHAI has levied a cost of negative COS of Rs. 1,15,20,284.24 on JMPTL and closed the punch list items.

ERM's discussion with *Land Acquisition Officer for Jaipur district* for tehsils of Jaipur, Sanganer and Bassi i.e. ADM-III indicated the following details on land acquisition and pending land matters:

- Nearly INR 14 crore of compensation (including INR 6 crore for govt. land) amount is deposited in the treasury by the Competent Authority. The disbursement could not be done on account of disputes of ownership and court cases against the land acquisition process as reported by CA; and
- On account of nonpayment of compensation for govt. land and assets, nearly 7000-8000 sq. m. of land has not been formally handed over to NHAI. Besides, it is understood that there is 5 Ha of govt. land in all the impacted tehsils which is yet to be transferred to NHAI (all service road area). However, the road has been physically constructed on these patches which means that the land may still belong to respective govt. departments.

Further the list of encroachment/encumbrances provided by the JMPTL route patrol team was verified by ERM during the site assessment. The verified cases of encroachments have been provided in *Table 3.10* and detailed description of the encroachments is given *Annex B* for the report.

Table 3.8 *Verified number of Encroachment in JMPTL*

Type of construction	Total nos. of court cases	Total nos. of Govt Structure	Total nos. of cases where no information was available	Total Nos of cases who were not eligible for compensation but have done opportunistic encroachment within ROW	Total nos. of cases where structures were not removed from ROW, due to pending compensation	Total nos of cases where compensation received but str.is not removed from ROW	Total nos. of cases where structures removed from ROW which includes opportunistic encroachment well as str. eligible for compensation	Grand Total ¹
Permanent	20	8	17	61	13	11	43	173
semi-Permanent		2	2	3	1	2	10	20
Temporary			1	2			1	4
Grand Total	20	10	20	66	14	13	54	197

¹ The above mentioned numbers of cases were enlisted in the list prepared and updated by route patrolling team of, JMPTL. Based on the observations made during regular patrolling It gets periodically updated. The list includes all the encroachments within ROW therefore total number of cases represents both opportunistic encroachments as well as structures eligible for compensation.

During the verification process, 197 reported cases of encroachment have been verified. These cases include individual and group structures especially in market areas.

- Reportedly there are 20 cases whose compensation is withheld on account of ongoing litigation in the court of law,
- there are 10 cases which are owned by govt and will be removed as per the govt procedures;
- 20 cases where owners could not be traced therefore reason for their establishment in ROW could not be ascertained;
- There are 66 cases of encroachment where owners have constructed small projections or sunshade like structures within ROW after Land acquisition process, as per consultations most of the owners are aware of these encroachments and have no objections in removing the same if required;
- 14 cases where owners claimed that they were not compensated for some part of affected structure or land and owners have already registered their complaints with LAO however till date no actions have been taken in this regard;
- 13 cases where owners have received the compensation but have not removed structures however they have no objections in removing the same if required; and
- Further 54 cases could not be traced out on ground because either they have shifted themselves or have been evicted from ROW as per the provisions of NH act. (Could have been squatters or people who have received compensation. Additionally there are 14 cases where owners have confirmed that they have removed their structures after receiving the compensation.

3.5.3

Overview on the Status of Litigations

This section provides an overview of litigations that are currently underway in relation to land acquisition, compensation and other land claim matters.

1. There are no pending litigations reported by JMTPPL on labor issues;
2. Litigations vis-à-vis three of the ten punch list items:
 - a) **Chainage 156.600- Administrative building not constructed at Toll Plaza-1 (Sikandra):** The land issue is in high court and litigations documents were not made available for review. As reported by JMTPPL and NHAI, this litigation is regarding the administrative building that was to be constructed at Sikandra Toll Plaza. Land owners have approached the Court and case is pending at High Court due to claims on land to be acquired. While the owners of this land parcel could not be contacted, the NHAI PD informed that acquisition of this parcel of land has faced community issues related to disturbance of law and order.
 - b) **Chainage 182.725 to 182.830- EHV tower near Sikandra:** NHAI and Rajasthan Rajya Vidyut Prasaran Nigam Limited (RRVPL) - this case is regarding shifting of an EHV tower that was under the prerogative of RRVPL. NHAI has deposited the estimated amount for the shifting of EHV but the owners of the land where the EHV was

proposed to be shifted filed litigation against RRVPNL. The high court has placed a stay order on the issue. The service road does not get blocked as JMTPL has constructed the service road and merged with MCW. Crash barriers were also installed around the tower for safety.

- c) **Chainage 208.850 to 208.975- Service road incomplete in Mohanpura village due to a temple in ROW:** Trilokeshwar mandir and Moolchand Sharma have received a stay order from High court against NHAI's plans of shifting the temple property located at Mohanpura village. The temple is protruding into the ROW and due to that there is a break in the service road.

- 3. Based on ERM's discussions with Assistant of LAO for Jaipur district (ADM-III) on 4th Sep 2014 at the Rajasthan High Court, the following items are currently pending on litigations, land acquisition and compensation:
 - a) Nearly 8 number of court cases are ongoing reportedly on account of not getting fair compensation and till date none of these disputes are reported to be resolved;
 - b) Approximately 38 cases are linked to ownership disputes arising out of conflicts between interested parties and till date no case is settled. Most of the cases (ownership and compensation) are from Bassi tehsil.

3.5.4 Consultations with Community

Community consultations along the project area were undertaken to identify any prevalent concerns on the land acquisition process, community health & safety and specific stakeholder engagement. These discussions indicated that during the land acquisition and shifting process, squatters and encroachments along the right-of-way were removed without any assistance on resettlement and rehabilitation. As confirmed by the Project Director, NHAI, the assistance /compensation has been given to affected title holders only and as per the provisions of NH Act non-title holders are not entitled to receive compensation/ assistance in any form.

It is important to note that the NHAI does have a separate R&R policy provision for rights of all category of affected persons that is applied and implemented for multilateral funded projects involving entities such as the World Bank and the ADB. At the time of the acquisition process, these entities were not involved in the project and hence, this policy was not applied. As per the consultations with community most of the structure is partially impacted and people were not aware about the details of displaced structures/ families if any because most of them are either tenants or workers. Location wise details of these consultations has been presented in *Table 3.9* given below.

Table 3.9 *Details of Community Consultations*

Location	Group/person consulted	Description
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Location	Group/person consulted	Description
Near Dargah	Informal settlers on RHS near Chainage 227/228.	The Consulted Families are construction labourers working under contractor Deen Dayal Palni (locally known as Jain Seth). Approximately 10 families were living in temporary structures on RHS (if coming from Mahua) before the Dargah. These families belong to Scheduled Caste community and belong to Bharatpur district of Rajasthan and Gwalior district of Madhya Pradesh. These families have been living at this location for about eight to nine months and were involved as construction labourers (not for the toll road) and they also not aware of the land acquisition.
Bhagrana village	People living on land which is on punch list	There are approximately 30-40 households living on the land which falls in Baghrana village. Land is under jurisdiction of JDA and has not been transferred to NHAI. Consultations with people living there revealed that these villagers have been living here for a long time (one-two generations at least) and have identity cards, electricity meters installed at their homes. Their main sources of livelihood consist of wage labour and private salaried jobs in Dausa and Jaipur cities. People living further inside of Baghrana village are mostly farmers. Their legal status with respect to land ownership could not be ascertained however as if now it appears that they are treated as informal dwellers. When asked about land acquisition for the toll road, ERM was informed that land acquisition for the toll road was done about seven-eight years back and 70- 80 people from village Bhagrana (not living at the current location) have lost their land located at different places. However as if now nobody on the existing location (chainage) was impacted and the original status is maintained.
Kanota	Shopkeeper on RHS	ERM inquired into the process of land acquisition for the toll road and was informed that the process was started in 2005. He further informed that around 100 people lost their land in this process and compensation of approximately 15-20 lakhs per bigha were provided as compensation for farmers. He was not aware of any resettlement undertaken for evicted families.
Badhana	Community LHS	There are nearly 10-15 structures enlisted in the encroachment list of JMTPL. Discussions with the community reveals that currently 10 -15 families are residing on the land adjacent to the present ROW and land belongs to govt. Most of them were residing at the same place since long time and do not have any legal documents for land. Further community informed that originally they are from other village but their farm land was located near to the project road therefore their ancestors had exchanged their land with the previous settlers around 1950-60s. Although land is gazetted however none of the affected families were entitled for compensation and everyone has been asked to leave the place. However community has made application for entitlements towards compensation to the concerned LAO and District Administration.
Samlethi	Community LHS	Village Samlethi, which falls under district Dausa is the first village of the project, where land has been acquired and accordingly compensation has been paid for the affected properties. However the affected persons claim that a few affected structures were left out hence no compensation was paid for those assets. All the villagers have decided not remove their structure (10-15) until they receive the full compensation. Further villagers have submitted an application to the concerned LAO regarding the same, but till date no action has been taken.

Protected Forest is defined under the provisions of India Forest Act or the State Forest Acts having limited degree of protection. In Protected Forests all activities are permitted unless prohibited. Protected Forest is an area over which the Government has property rights, declared to be so by a State Government under the provisions of the section 29 of the Indian Forest Act, 1927. It does not require the long and tedious process of settlement, as in case of declaration of a reserved forest. Further, in a protected forest, the Government may issue notifications declaring certain trees to be reserved, or suspend private rights, if any, for a period not exceeding 30 years, or prohibit quarrying, removal of any forest produce, or breaking of land etc.

Reserved Forest is an areaduly notified under the provisions of India Forest Act or the State Forest Acts having full degree of protection. In Reserved Forests all activities are prohibited unless permitted.

The project road of Jaipur-Mahua traverses along forest land with Protected Forest land area as 294.615 ha (falling from Km 12 to Km 127.500, Km 127.500 to Km 132.500, Km 132.500 to Km 163.500, Km 163.500 to Km 190.825, Km 190.825, Km to 221.500 and Km 221.500 to Km 229.478) and 1.84 ha area under Reserved Forest (km 226.0-km 226.528).

Forest clearance (Stage-I & StageII) was obtained for the entire section from Jaipur to Bharatpur on 16.11.2005 and September 2006. The EIA report prepared by CEG does not include details on the biological environment and information on flora and fauna is not presented. Forest Diversion proposal submitted to the Forest Department for obtaining Forest Clearance, could not be reviewed as it was not made available to ERM and therefore further details on affected flora and fauna could not be reviewed.

As per the Forest Clearance Letter, tree species like Gulmohar (*Delonix regia*), *Cassia Samea* and Karanj (*Millettia pinnata*) were proposed to be planted along the outer row while shady tree species of Neem (*Azadirachta indica*), Sheesham (*Dalbergia sissoo*) and Amaltas (*Cassia fistula*) were proposed to be planted along the middle row. In addition, shrubs were also proposed to be planted in the median along the entire project highway. However, the site assessment revealed that the avenue plantation is yet to be complete with the suggested tree species as given in Forest Clearance letter.

As per the Annexure-X to Annexure-I of the Concession Agreement (Vol-II) item 2.3 regarding environmental clearance, cutting of trees and compensatory afforestation states that, " The Concessionaire will obtain all the necessary clearances/permits, cut the trees and carry out compensatory afforestation. NHAI will provide necessary support and shall bear all such

costs, which are intimated by the concerned Government agencies.” The tree cutting details for the 4-laning of NH-11 from Mahua to Jaipur, i.e. from Km 120 to Km 228, based on the recommendation of the Review committee as per letter no. NHAI/11013/8/2K (Envi)/69, dated 19.01.2006 is provided below:

Table 3.10 *Details of Tree Cutting*

SN.	Description of the item	No. of trees to be cut as per original proposal	No of trees saved after review	Final no of trees to be cut
1.	Dausa division including Mahua-Bharatpur Stretch*	17454	2287	15167
2.	Karauli Division	1359	251	1108
3.	Jaipur (South Division)	6686	1460	5226
4.	Jaipur (Central) Division	3264	1185	2079
5.	Total	28763	5183	23580

Source: JMTPL/NHAI/555/05/2010 dated 25/05/2010

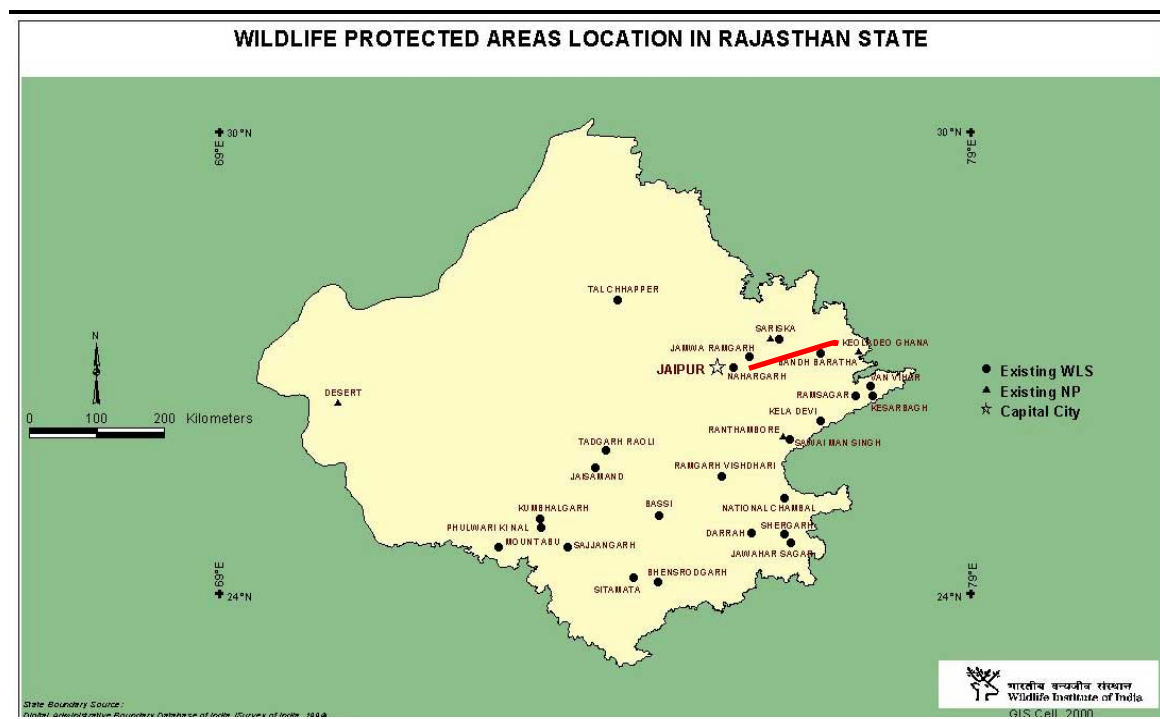
* Includes some stretch of Mahua -Bharatpur also

There is a pending litigation in the High court of Delhi by Jaipur Mahua Tollway Private Limited against National Highway Authority of India under Arbitration and conciliation Act, 1996 with Section 151 of Code of Civil procedure,1908 dated 17.04.2014 asking for recovery of an alleged amount of Rs.72,09,950/- from the Escrow Account). Lea Associates South Asia Private Limited (LASA), the Independent Engineer has assessed and imposed damages for JMTPL for non-maintenance of the project on account of default in plantation of trees by NHAI along the project corridor.

Forest Clearance was further also obtained for the diversion of 0.39 ha of Protected Forest Land at Km 204 for Toll Plaza on 27.06.2007.

Also, to understand the status of the critical habitat available in the project area, literature review and documents related to biodiversity, forest working Plans of Dausa and Jaipur division were studied. The map below shows the wildlife protected areas in the state of Rajasthan and also the project corridor marked on it.

Figure 3.5 Wildlife Protected areas of Rajasthan



The map above shows that the project road is in some proximity to Nahargarh Wildlife sanctuary, Keolodeo National Park and Sariska National Park at about distances of 70 kms, 62 kms and 35 kms respectively. The project road does not envisage any movement of wildlife from these areas to the project corridor. Birds will not be impacted as the road is not passing through their habitat. The mammal species found in the above wild life sanctuaries are usually Panther (*Panthera pardus*), Chital (*Axis axis*) Wild Boar (*Sus scrofa*), Striped Hyena (*Hyaena hyaena*), Sambar (*Rusa unicolor*), Nilgai (*Boselaphus tragocamelus*), Indian Jackal (*Canis aureus indicus*), Red Fox (*Vulpes vulpes*), Jungle Cat (*Felis chaus*), Leopard (*Panthera pardus*), Striped Hyena (*Hyaena hyaena*), Nilgai (*Boselaphus tragocamelus*), Indian Jackal (*Canis aureus indicus*), Red Fox (*Vulpes vulpes*), Jungle Cat (*Felis chaus*), Indian Wolf (*Canis lupus pallipes*). However, the above mentioned mammalian fauna are not found and no wildlife movement of such animals is evident in the project area .

Forest Working Plan, Dausa Division

Dausa is occupied by hill ranges and numerous isolated peaks These hills and peaks belong to the Aravalli hill system . Total 317 wetlands are mapped including 223 small wetlands (< 2.25 ha) with 11720 ha area. Rivers/ streams with 8685 ha contributed 74.10% to the total wetland area. However, these areas do not fall within the vicinity of the project corridor. Moreover, the working plan mentions protected forest land of 188.28 ha falling within NH-11 in Dausa Division. The protected forests do not have trees of medicinal importance.

Jaipur is in the eastern part of the state. It is the capital city of Rajasthan and located at 431 meters altitude from mean sea level. Jaipur district is bounded in the North by Sikar. It touches Tonk District in the South and in the Alwar, Dausa, Sawai Madhopur Districts in the east. The district is bounded by Nagaur and Ajmer districts in the west. A total of 1484 wetlands are mapped including 1054 small wetlands (< 2.25 ha) with 41352 ha area. The Rivers/streams with 23598 ha. contributed 57.07% to the total wetland area. The Tanks/Ponds with 3774 ha (9.13% area) is the second major wetland category, followed by Reservoirs/Barrages with 2926 ha area i.e. 7.08 %. Thus, the district is dominated by man-made wetlands.

In Rajasthan state, there are some Medicinal Plants Conservation Areas, however, review of the working plans state that the project corridor does not envisage the forests falling under the medicinal Plant conservation Areas.

The project area has mainly wastelands along the corridor, except at stretches where it traverses protected forest and reserve forest land. There is no critical habitat and endangered areas within the proximity of the project corridor.

3.2 KEY EHS AND SOCIAL OBSERVATIONS

The following table summarizes the key EHS and Social observations by applying the IFC ESDD Screening Criteria for Operational Toll Roads. As illustrated through the subsequent table, the project road falls under “Category 1: Operating roads (2 or more years)”:

Table 3.11 Summary of Key EHS and Social Issues as per the IFC Screening Criteria

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Litigation	<ul style="list-style-type: none"> • A stay order has been issued by High Court where NHAI and JMTPL are opposing parties. NHAI had levied a penalty of 72 lakhs for non-pursuance of clause 18.3 of the Concession Agreement. A stay order has been placed by Delhi High Court in this regard. • NHAI and Rajasthan Rajya Vidyut Prasaran Nigam Limited (RRVPL) - this case is regarding shifting of an EHV tower that was under the prerogative of RRVPL. NHAI has deposited the estimated amount for the shifting of EHV but the owners of the land where the EHV was proposed to be shifted filed litigation against RRVPL. The high court has placed a stay order on the issue. • Trilokeshwar mandir and Moolchand Sharma have received a stay order from High court against NHAI's plans of shifting the temple property located at Mohanpura village. The temple is protruding into the RoW and due to that there is a break in the service road. • Nearly 10-15 number of court cases are ongoing reportedly on account of not getting fair compensation and till date none of these disputes are reported to be resolved; • Approximately 38 cases are linked to ownership disputes arising out of conflicts between interested parties and till date no case is settled. Most of the cases (ownership and compensation) are from Bassi tehsil; <p>Please Refer PS 1 in Table 4.1 for recommendations.</p>	<ul style="list-style-type: none"> • The service road does not get blocked as JMTPL has constructed the service road and merged with MCW where EHV tower issue is there. Crash barriers were also installed around the tower for safety. • Litigations related to compensation or land disputes are sub-judice and do not directly affect JMTPL. • Service road is blocked where the temple is present but main highway is not affected.
Legal Permits/Consents	<ul style="list-style-type: none"> • Consent to Operate and Consent to Establish for the Hot Mix Plant has not been obtained by the Subcontractor- Krishna contractor. <p>Please Refer PS 1 in Table 4.1 for recommendations.</p>	As per NHAI's Concession Agreement, All necessary approvals and licenses have to be obtained by the SPV.

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
<p>Assessment and Management of Environment and Social Risks and Impacts</p>	<ul style="list-style-type: none"> • JMTPL does not have an Environmental and Social Management Plan to assess the risks involved in the operation and maintenance of the toll road. The existing EMP is a document related to construction works and activities and does not describe specifically the operation related tasks.; • There is no Contractor management system for E & S performance which provides a set procedure for management of the various sub-contractors;; • Monitoring of the maintenance contractors is not being carried out by SPV-JMTPL as a requirement of the Concession agreement; and • The Independent Engineer to NHAI is LASA, however, at JMTPL, there are no internal and external auditing procedures that are currently being followed for SPV-JMTPL as well as for maintenance contractor activities. • There is a DPR for the project prepared by CES. The DPR has an Environmental Impact Assessment which is not detailed and does not provide the project and road section specific sensitive features, baseline and impacts of the road construction and operations on these receptors. • JMTPL does not have an Environmental and Social Management System Manual to assess the risks involved in the operation and maintenance of the toll road. The EMP is a document related to construction works and activities and does not describe specifically the operation related tasks.; • There is no Contractor management system which provides a set procedure for management of the various sub-contractors and their selection checklists and monitoring procedures etc.; • Monitoring of the maintenance contractors is not carried out by SPV-JMTPL as a requirement of the Concession agreement; and • The Independent Engineer to NHAI is LASA, however, at JMTPL, there are no internal and external auditing procedures that are currently being followed for SPV-JMTPL as well as for maintenance contractor activities. <p>Please Refer PS 1 in Table 4.1 for recommendations.</p>	<ul style="list-style-type: none"> • Majority of the environment and social issues for the project corridor are due to the inadequate oversight and absence of the monitoring of the maintenance contractor as well as maintenance of the records and documents. Although there is an Environment Management Plan it is more tailored to the construction works and activities rather than operation and maintenance, as a result there is no EMP guiding the Operation Phase of the project.

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Land and Resettlement issues	<ul style="list-style-type: none"> Land Acquisition for the project was done more than seven years back and the road has been operationa; for more than five years. Discussion with NHAI PD revealed that the Land Acquisition Plan has not been shared by JMTPL with NHAI. NHAI PD also highlighted the need for updated details for ROW mapping which was supposed to be present in Land Acquisition Plan. The R&R for the project is done as per the requirements of NH Act which does not necessitate the requirement for rehabilitation other than the compensation of lost assets. Therefore no efforts have been made from NHAI regarding the rehabilitation of project displaced families.. Further RAP is also not having required details of project displaced families however possibility of cannot be neglected As informed by the project director NHAI, compensation and resettlement and rehabilitation of affect persons was done as per the requirements of NH Act. There is ongoing removal of encroachments and temporary structures. It is also possible that there may be removal of residential structures occupied by people without legal rights. <p>Please Refer PS 5 in Table 4.1 for recommendations.</p>	<ul style="list-style-type: none"> The non-acquired parcels do not completely affect the road operation however there are safety risks involved with them as service roads get blocked at these locations. Further it's a liability until it is not scoped out from their agreement; Issue related to land acquisition; displacement and resettlement are mostly closed as the toll road has been operational for more than 5 years. As discussed with NHAI, there are no pending claims regarding compensation. However there the process of clearing the ROW and removing those that have either been compensated, or those that are not agreeable to the compensation award needs to be monitored and documented. There could be grievances during the process that would need access to a GR mechanism.
Stakeholder/ Community Engagement	<ul style="list-style-type: none"> JMTPL does not have a Stakeholder Engagement Plan in place and it was reported that JMTPL does not engage with community directly. Their main engagement is with NHAI and district administration along with Jaipur Development Authority. No community development work or CSR activity is undertaken by JMTPL or any of the contracted companies in the area. <p>Please Refer PS 1 in Table 4.1 for recommendations.</p>	Absence of direct community engagement and social support has implications during times of protests and unrest. On the other hand, JMTPL management is apprehensive that direct community engagement creates more liabilities and unwanted accountability in part of JMTPL on issues which are under the jurisdiction and responsibility of NHAI and district government.
Grievance Mechanism	<ul style="list-style-type: none"> JMTPL maintain a community grievance register to record complaints and issues from the community. However, there is no employee grievance redressal mechanism present in JMTPL or in any of its sub-contractors. Till date 94 complaints were recorded in the register (16 in 2014) and most of the complaints were regarding toll operations or road condition. This register is sent to NHAI office in Dausa for weekly review. It was reported that toll collectors had gone on strike earlier this year as a toll booth collector was terminated because of his involvement in toll collection malpractice. This affected the toll collections, as the JMTPL staff had to operate the toll booth in fear of labour unrest. <p>Please Refer PS 1 in Table 4.1 for recommendations.</p>	Without an employee grievance redressal mechanism, company might not understand its workers' issues and problems. In addition, the grievances of contract workers could also go unheard and in light of recent toll collectors strike, it has a negative implication on the operations of toll road.

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Health & Safety	<ul style="list-style-type: none"> • The corridor is free of any at-grade crossings with other roads, railways, or pedestrian paths, which are instead directed through underpasses across the highway. On the controlled-access highway, opposing directions of travel are generally separated by a median strip or central reservation containing a traffic barrier or grass. There are two designated Highway-Patrolling vehicles for the section, i.e. MS-1 and MS-2. Two ambulances have also been provided for emergency purposes. There is a Project Safety Plan of JMTPL prepared in November 2005, however the implementation of the same was observed to be inadequate. The plan is more focused on the construction stage activities. There are signboards provided to caution on speed limits and pedestrian crossings, however, these were inadequate in urban areas and around schools. At such locations, where there are schools adjacent to the ROW, there should have been crash barriers provided to prevent students from moving on to the road. • There is no community health and safety plan/engagement regarding road safety with people residing in the settlements along the right of way. Pedestrian crossings are not provided at various locations and school children were observed to be crossing the highway at various locations. • The DPR has identified sections of the road where cattle movement is frequent. As per the review of the Design Feasibility Report, there should be vehicle/cattle/pedestrian underpasses based on cross road configuration of 4m X 3 m along the project road. Considering these, the number of underpasses provided to facilitate such movements of cattle and other animals could be inadequate. The ERM team observed 3-4 dead cows on the highway stretch during the site visit. However, the maintenance of road for aspects like timely removal of carcasses was inadequate. Consultations with a cattle herder revealed that if their cattle is run over and they are able to catch the accused, they demand a compensation of INR 10,000 for a goat and more if a cow/buffalo is killed. Moreover, there was lack of proper signage to warn drivers of possible animal and cattle movement ahead and to reduce collisions between animals and vehicles; • It was observed that subcontractor workers were engaged in painting activities (painting of median paves), pruning of vegetation on median along respective sections, but with inadequate protective barriers to shield workers from the moving traffic and installation of channelling devices such as traffic cones and barrels was not observed. • Significant number of multi-axle vehicles parked in the corridor on both sides outside the Truck-lay bye space and number of vehicles driving in the opposite direction on the main expressway, for e.g., tractors with bricks, vehicles with marble stones, motorcycles, buses, JCB riding in the opposite direction. School children crossing the road at a number of chainages, where the school is just adjacent to the ROW, no signboards for such crossings have been provided, though, this was a requirement in the Design Report; • Highway patrolling is not adequate as the response time for an emergency is more than 15 mins; and • Also, presently JMTPL has a manual accident control system with ambulance and highway patrolling system. The emergency contact numbers are also displayed at intermittent sections; however, there is a need for an automated and more efficient Highway Traffic Management system 	<p>Due to the insufficient road safety control measures for the Project road and the inadequate monitoring system, there has been a considerable increase in the number of major and minor accidents. It is understood that if the monitoring of the operational road is not carried out on a regular system, the accident situation will not decrease. HTMS systems are needed to ensure the instant response and control of the road accidents, because this will also allow understanding the root cause analysis and providing corrective measures for accidents and safety incidents.</p>
<p>ENVIRONMENTAL RESOURCES MANAGEMENT PROJECT # NU0429/0258116</p>	<p style="text-align: center;">48</p> <p>Please Refer PS 2 in Table 4.1 for recommendations.</p>	<p style="text-align: right;">I-SQUARED CAPITAL, NEW DELHI DECEMBER 2014</p>

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
HR/ Contractor Management	<ul style="list-style-type: none"> • There are a total number of 38 permanent employees working under JMTPL with six stationed in Hyderabad office of and IJM, and 32 working from Rajadhok site office. JMTPL has engaged more than 300 employees who work under 10 different contractors for security, RoW maintenance, road maintenance, toll collection etc. JMTPL has an HR manual which is applicable to all the employees of the company including expatriate employees who works on a secondment to the company. • All contracted construction and maintenance workers fall in unskilled or semi-skilled category. The contractors were reported to be following the applicable minimum wage standards. This was corroborated by consultation with workers. JMTPL maintains a wage register for all contract labour which has details of Basic pay, HRA and EPF. • There is no Contractor Management System but certain contractor management practices were observed on site. Contractor agreements include Terms and conditions which among other things includes conditions of abiding by all applicable laws, regulations of state and central government and requirements of Company's safety manual failure to results in 'stop work' or termination of the contract. <p>Please Refer PS 2 in Table 4.1 for recommendations.</p>	Absence of contractor management plan and monitoring of performance of contractors in labour compliance aspects, especially in health and safety has implication on toll operations as accidents/incidents during toll road work can lead to direct liability on JMTPL.

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Pollution Prevention	<p>Permit conditions provide a framework of requirements on pollution control and environmental management. A No Objection Certificate (NOC) from Rajasthan State Pollution Control Board has reportedly been obtained; however, it was not made available for review by the site management. Thus, the specific conditions laid in the NOC could not be verified. The review of project documents and site assessment of the project road for environmental aspects revealed the following observations</p> <ul style="list-style-type: none"> • The contractor, Krishna Infrastructure, has installed a Hot mix Plant a few km inside of the National Highway, but it has not obtained Consent to Establish and Consent to Operate from Rajasthan State Pollution Control Board. The plant has installed 5 burners with capacity of 30 tonnes, 18 tonnes, 25 tonnes (2 No.) and 20 tonnes; • No legal register has been prepared by the SPV-JMTPL covering permits, approvals, and other regulatory requirement details. The register should cover health, safety and social related national, state and local government regulations to make it comprehensive. Only document available is the Concessionaire Agreement which lists the permits/approvals required to be obtained prior to construction activities by JMTPL; • The EMP does not provide a Monitoring Plan during the Operation Phase. As a result, monitoring of ambient air and noise and is not being carried out for the project corridor. Moreover, The project corridor does not undertake Ambient Air and Noise Monitoring at sensitive locations along the project road stretch. As the NOC from RSPCB could not be reviewed, the monitoring requirements could not be verified; • It was observed during the site visit that the storm water drains are poorly maintained leading to water clogging. Also there are some tradesmen engaged in making sculptures from marble stone and refuse and waste water from their activities finds its way into the side drains thereby resulting in clogging of the side drains and water logging; • Poor maintenance of the carriageway with respect to waste, debris and litter, that was observed to be scattered on teh ROW edge as well as the median in some chainages; • Multi-axle vehciles ply on this road and a majority of them were cited to be parked inside the carriageway, including the urban sections. The project does not calculate, estimate and account for the GHG emissions due to the mobile sources of transportation, based on the average number of motorized vehicles plying on the road on monthly and annual basis. <p>Please Refer PS 3 in Table 4.1 for recommendations.</p>	<ul style="list-style-type: none"> • Poor drainage systems are likely to pose as a water logging issue during heavy rains , with highways getting blocked and increasing accident risks. Also, it reduces the bearings strength ratio of the road causing extensive wear and tear; • Poor maintenance of the carriageway for solid waste, resulting into the clogging of the ROW drains.

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Natural Habitats	During the site assessment, a carcass of water monitor lizard was observed on the main carriageway, however the existence and movement of such reptilian fauna in the area could not be verified as there was no description of the biological environmental profile in the EIA report. The EC letter also does not mention about the requirement of a reptile underpass. The letter clearly mentions that there are no threatened /endangered species present in the project area. Moreover, the economic importance of the protected forest and the reserve forest could not be assessed due the non-availability of the Forest Diversion Proposal. Avenue Plantation is also yet to be completed in some of the chainages . Please Refer PS 6 in Table 4.1 for recommendations.	An importance parameter to be monitored for understanding the occurrence and extent of movement of such species.
Indigenous peoples, tribes and communities	<ul style="list-style-type: none"> NHAI PD informed that some of the land acquired was from Scheduled Tribe families, specifically the Meena community. No section of the project road goes through designated Schedule V areas. While the <i>Meena</i> community is a scheduled tribe, within the social context of the project, this community group is well integrated and mainstreamed and could not be considered as marginalized or vulnerable as a group, even though individual households could fall into that category, in the same manner as a family from a non-tribal family could. . Any potential economic impacts from the land acquisition on the Meena community are likely to be similar in intensity as compared to other impacted entities; Random assessment of limited available data from the various tehsils suggests that the proportion of tribal land to the total land acquired would be small. However this assessment is based on a very small sample data and is only being used to demonstrate a trend. 	Though <i>Meenas</i> are ST community, they were observed to integrated with the larger community and are one of the dominant communities in the project area, the other being <i>Gurjars</i> . Both communities have a strong presence politically and can have community based implications on toll operations and are not marginalized and vulnerable as a group. Hence specific provisions of IP may not be applicable in this project.
Cultural Heritage	There are two cultural properties which were found to be on the RoW- Temple in Mohanpura village (Chainage 208.850- 208.975) and dargah located in Jamdeli (Chainage 228.860 to 229.00. These properties are already on the punch list and in case of the temple; a case is also underway in court regarding removal of property Please Refer PS 8 in Table 4.1 for recommendations.	The area from where the highway passes is dotted with various temples, mosques, dargah and at two locations, they are actually impeding into the RoW. A dargah at Jamdeli and a temple in Mohanpura block the service road and hence, a break on the service road is present. These locations are not sites of archaeological importance and are not present in Rajasthan's heritage list as per Archaeological Monuments List. (In <i>General NHAI relocates the affected religious structures in consultation with the community, on the land either provided by the community or where land is not available with the community and if community agrees it is relocated at edge of the ROW. And bears the additional cost of construction for such affected structures</i>).

Criteria	Key Gaps and Issues	Implications/Risks to Project Operations
Community Health & Safety	<p>The corridor of NH-11 for the Jaipur Mahua stretch was observed to be a non- controlled-access highway as it provides hindered flow of traffic, with no traffic signals, intersections or property access. However, in some stretches, the entrance and exit to the highway are not provided at interchanges by slip roads (ramps), which allow for speed changes between the highway and arterial roads. In addition, there has been no control Elimination of the sources of potential conflicts with travelers coming in the opposite direction. There is no community health and safety plan/ engagement regarding road safety. Pedestrian crossings are not provided at various locations and school children were observed to be crossing the highway at various locations.</p>	<p>The high number of accidents might become an issue to the project where community sentiments can get flared up due to recurring accidents. Since highway was opened for public use and till June 2014, a total 270 fatal and 705 serious accidents have taken place. In 2014, 22 fatal and 59 serious accidents have already occurred. Lack of access control, non-enforcement of basic traffic rules, low road maintenance cannot be completely ignored in light of these figures</p>

This section provides the gap assessment of the project road against the IFC Performance Standards and IFC EHS Guidelines. The projects are designated as Category A, B, C or FI when it represents, respectively, a high, medium or low level of risk.

In accordance to the screening criteria of the IFC, the categories are:

- **Category A:** activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented;
- **Category B:** Business activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures;
- **Category C:** Projects with minimal or no adverse social or environmental impacts; and
- **Category FI:** Projects which involve investment of Bank funds through a financial intermediary, in subprojects that may result in adverse environmental impacts.

As per the Indian Legislation i.e EIA Notification (2006) as amended till date, Highway projects are classified under Category A and Category B as under:

- **Category A:** all new national highways (including construction and/or expansion of the existing highways) as per EIA Notification 2006 (amended December 2009); and
- **Category B:** all state highways and state highway expansion projects in hilly terrain (above 1000 m AMSL) and or ecologically sensitive areas as per EIA Notification 2006 (amended December 2009).

Based on ERM's site assessment, review of documents and discussions with the regulatory authorities, the Project Corridor of Jaipur-Mahua stretch of NH-11 has been categorized as 'Category B' and as "Category 1: Operating roads (2 or more years)" under IFC Screening Category on the basis of the following:

- The key reason of considering this project as Category 1 is because the project road has been operational for more than 2 years as of date;
- **Project Impacts:** As the road is currently in operational stage, it has limited adverse environment and social impacts as adequate measures were taken during the project design such as provisions for vehicular underpasses, service roads in the urban stretches, and speed signboards along the project corridor, though ERM has observed that these measures need to be strengthened. The land acquisition for the toll road was undertaken around seven years back and has been largely completed apart from small land parcels as discussed in the punch list. These pending land acquisition items affect the service road and drainage of the toll road and not the main toll road operations;

- The project road traverses along protected forest (defined under the Indian Forest Act as an area having limited degree of protection. In Protected Forests all activities are permitted unless prohibited stretches falling under Jaipur and Dausa districts for which forest clearance (Stage-I and Stage II) has already been obtained and Compensatory Afforestation has already been done as suggested by the MoEF. Also, based on the literature review, it was identified that the nearest wild life sanctuaries are over a distance of 60 km from the project corridor and wildlife movement in terms of mammalian fauna is also very less near to the project corridor. The project corridor does not fall in a critically endangered habitat area.
- The project road has been in operation since September 2009 and most of the land has been handed over to JMTPL. . However there are still few patches of land where land acquisition could not be completed on account of ongoing litigations and objection from their respective owners. It has to be iterated that none of the pending litigations or punch list items hinder the flow of the main toll road. These issues are limited to service road, junction development and saucer drains. Furthermore, the toll road has been operational for more than five years and there is no future land acquisition plan in pipeline;
- **Extent of Impacts:** The limited social and environmental impacts are site-specific and are located within the right-of-way of the corridor of impact.
- Review of the accident data states that the number of fatal cases has increased from 31 in 2008 to 56 in 2013 and almost 19 till May this year. Monitoring by the patrolling vehicle is poor and inadequate; and
- **Management Systems:** JMTPL, although a subsidiary of an ISO certified organization, IJM, has not implemented effective management and monitoring systems at the project level. The implementation of environment management system, monitoring of the sub-contractor activities is inadequate.

4.2

GAP ASSESSMENT

Table 4.1 provides the compliance status of the environmental and social performance of the Project as per requirements of the IFC Environmental and Social Performance Standards, 2012 and applicable Indian regulations.

Table 4.1 Gap Assessment to the IFC Performance Standards (2012) of the Jaipur Mahua Tollway Private Limited

SN.	Requirements	Observation/Gap	Recommendation
1	IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts		
	This section provides a high-level assessment of the adequacy of environmental and social management systems of - Jaipur Mahua Tollway Private Limited as the Concessionaire, that have been implemented. Overall, it should be noted that as IJM Group is a diversified conglomerate with multiple subsidiaries, it is a challenge to devise an overarching approach to managing social and environmental risks and impacts.		
1.1	<p>The client will establish and maintain a Social and Environmental Management System (SEMS) appropriate to the nature and scale of the project and commensurate with the level of social and environmental risks and impacts.</p> <p>The SEMS will incorporate the following elements:</p> <ul style="list-style-type: none"> • Social and Environmental Assessment (SEA or EIA) • Management program • Organisational capacity • Training • Community engagement • Monitoring • Reporting 	<p>The following gaps were identified in the environmental and social management systems:</p> <ul style="list-style-type: none"> • Even though IJM is an ISO certified and OSHAS certified organization, implementation of the management systems Manual was inadequate at the subsidiary level. JMTPL does not follow the Environmental and Social Management System Manual of IJM to assess the risks involved in the operation and maintenance of the toll road and neither does it follow up the Group Integrated Management System Manual. It does not have a documented ESMS for the road operations; • IJM has a QHSE Policy , but JMTPL has not implemented that policy for those road project and also Corporate Policy was not known to the Site management at JMTPL; • There is no Contractor management system which provides a set procedure for management of the various sub-contractors and their vendor selection checklists and monitoring procedures etc.; • Monitoring of the maintenance contractors is not carried out by SPV- JMTPL as a requirement of the Concession agreement; and • The Independent Engineer to NHAI is LASA, however, at JMTPL, there are no internal and external auditing procedures that are currently being followed for SPV-JMTPL as well as for maintenance contractor activities. 	<p>JMTPL should develop an Environment and Social Management System (ESMS) for covering road operations, maintenance and management. The ESMS manual should cover the following aspects:</p> <ul style="list-style-type: none"> • Key environment , social and health and safety issues associated with the road operations ; • Site Specific Risk Assessment; • Risk Assessment for sections involving widening/expansion; • Environment and Social Risk Assessment and Management Plan for the entire project, with site specific and issue specific plans focussing on the main issue like safety, community H & S, drainage management, traffic management and patrolling, safe passage to community, cattle and wildlife, stakeholder engagement and management, grievance redressal, etc. ; • ESMS Organization Structure; and • Monitoring and Reporting plan
1.2	<p>Policy: The client will establish an overarching policy defining the environmental and social objectives and principles that guide the project to achieve sound environmental and social performance. The client will communicate the policy to all levels of its organization.</p>	<p>As mentioned above, IJM has a policy statement on health, safety and Environment formulated on February 1, 2011. However, discussions with the site management state that JMTPL does not follow the corporate Policy. Neither the Corporate Policy statement is displayed at the administration office of JMTPL. Thus, there is no EHS policy that is currently being followed by JMTPL and that sets environmental and social objectives in the context of the project being operated.</p>	<p>JMTPL should either develop an Environmental, Social, Health and Safety Policy for the present project or adopted and implement IJM’s corporate Policy redefining the objectives at the project level cover environmental, social and health and safety aspects.</p>
1.3	<p>Identification of Risks and Impacts: The client will conduct a process of Social and Environmental Assessment that will consider</p>	<p>JMTPL has an Environmental Management Plan (EMP) prepared in March 2006 for the execution of the BOOT road project. Environment Impact Assessment Report and Resettlement Action Plan (EIA& RAP) was prepared</p>	<ul style="list-style-type: none"> • The ESMP should be revised and needs strengthening, focussing on the environmental and social aspects in the

SN.	Requirements	Observation/Gap	Recommendation
	<p>in an integrated manner the potential social and environmental (including labour, health, and safety) risks and impacts of the project. The ESA should cover the project area of influence across the project lifecycle.</p>	<p>by Consulting Engineers Group (CEG) Limited in September 2003. However, the Land Acquisition Plan for the entire project road could not be reviewed as it was not made available to ERM. IJM-JMTPL has a Project Safety Plan for the improvement, operation and maintenance, rehabilitation and strengthening of the 4-lane divided highway of Mahua-Jaipur Section of NH-11. Review of the Final environment Impact Assessment Report and RAP- Volume-IV dated September 2003 states the following gaps:</p> <p><i>Project Description</i></p> <ul style="list-style-type: none"> • The report is very generic in nature and does not provide a clear description of the project, for eg. the quarries, borrow areas, proposed underpasses, that were required during the project phase; • The report does not provide details on resources required for the project and their sources; <p><i>Administrative Framework</i></p> <ul style="list-style-type: none"> • The report does not provide information on regulatory requirements for the project. <p><i>Environment and Socio-Economic Baseline</i></p> <ul style="list-style-type: none"> • The report does not provide any detailed baseline information about the ecological environment and the details on flora and fauna species; • The EIA report does not profile environmental and social sensitivities, such as the cultural properties, schools, hospitals and the forest areas; <p><i>Impact Assessment</i></p> <ul style="list-style-type: none"> • There is no segment on impact assessment s related to the construction and operation phase activities of the project; • Impacts of the project activities on the forest areas are not provided. The exact chainages that are falling in the forest land have not been defined. • The report does not cover details on project affected persons, the exact land details and no social impact assessment has been conducted. • The SIA/RAP for the project does not provide details on number of 	<p>operational phase, covering the gaps identified in the current EMP. The ESMP will need to get site specific impact information and mitigation measures to be appropriately strengthened. For example drainage and water management will need site specific plans and so will plan to prevent opportunistic encroachment along the ROW may have focus on a few segments on the road.;</p> <ul style="list-style-type: none"> • The ESMP should clearly provide an Environmental and Social Monitoring Plan for monitoring of the parameters like air, water and noise, annually along the project corridor and as per the directions and specific conditions of RSPCB. • The ESMP should target documentation and consolidation of land, compensation and resettlement related information. • In case of any additional activity to deal with squatters or encroachers need to be initiated, or any land acquisition is planned in future, JMTPL needs to ensure that while NHAI may still lead the process, the provision of PS 5 need to be incorporated in the resettlement process, including consultation, disclosure and the community involvement in designing the compensation package, if any. This should be developed into a Supplemental RAP, if there is physical or economic displacement involved. • The ESMP should also monitor social issues like community grievances, accidents, stakeholder engagement, incidence of new encroachments, social investments and CSR,

SN.	Requirements	Observation/Gap	Recommendation
		<p>project affected persons (PAPs), compensation details, land acquisition and resettlement process.</p> <ul style="list-style-type: none"> • Almost all of the required land has been acquired by NHAI except for some portions which have been duly mentioned in the punch list items (described in Section 3.5.6 of Chapter 3) amounting to a total of 600-800 sq. m. • The land portions in the punch list do not hinder the main toll-road and limited to service roads, saucer drains and junction development. <p><i>Management Plan & Monitoring Plan</i></p> <ul style="list-style-type: none"> • EIA report does not provide detailed project phase wise Environmental Management Plan i.e for construction and operation phase. Further management plans such as traffic safety management etc. are not provided; • Monitoring plan, roles and responsibilities for implementation of mitigation measures etc. is not provided in the EIA report. 	
1.4	<p>Establish Legal requirements for both social and environmental parameters - Applicable laws and regulations of the jurisdictions in which the project operates that pertain to social and environmental matters, including those laws implementing host country obligations under international law, will also be taken into account.</p> <p><u>E& S Screening Checklist requirement: Litigations: Full information on any outstanding litigation or notices from regulatory authorities related to environmental impacts, land/RoW acquisition, labour working conditions, occupational health and safety, community health and safety.</u></p>	<p>JMTPL has not established a legal register of regulations to address the requirements of local and national statutory requirements, which is being periodically reviewed and updated by the concerned departments. As per <i>Annexure X</i> of the Concessionaire Agreement- it is mentioned that the concessionaire will obtain all the necessary clearances/permits, cut the trees and carry out compensatory afforestation. NHAI will not be responsible for any delay on this account. NHAI's responsibility is only to provide necessary support and shall bear all such costs, which are intimated by the concerned Government Agencies.</p> <ul style="list-style-type: none"> • A stay order has been issued by High Court where NHAI and JMTPL are opposing parties. NHAI had levied a penalty of 72 lakhs for non-pursuance of clause 18.3 of the Concession Agreement. A stay order has been placed by Delhi High Court in this regard. • NHAI and Rajasthan Rajya Vidyut Prasaran Nigam Limited (RRVPNL) - this case is regarding shifting of an EHV tower that was under the prerogative of RRVPNL. NHAI has deposited the estimated amount for the shifting of EHV but the owners of the land where the EHV was proposed to be shifted filed litigation against RRVPNL. The high court has placed a stay order on the issue. Trilokeshwar mandir and Moolchand Sharma have received a stay order from High court against NHAI's plans of shifting the temple property located at Mohanpura village. The temple 	<p>JMTPL will require developing an updated and comprehensive environmental and social legal register for the project to ensure compliance to all applicable environmental clearance and permit conditions as well as those additionally required to meet the requirements of the applicable reference framework as defined by this ESDD. The register will need to be reviewed and updated frequently through the operational life of the project as well as for decommissioning</p>

SN.	Requirements	Observation/Gap	Recommendation
		<p>is protruding into the RoW and due to that there is a break in the service road;</p> <ul style="list-style-type: none"> Consent to Operate and Consent to Establish for the Hot Mix Plant has not been obtained by the Subcontractor- Krishna contractor and neither it has been enforced by JMTPL - the principal employer; Review of the Environmental Clearance obtained for the project stretch on 1st August,2006 identified certain gaps which have been included in <i>Table 2.3</i> 	
1.5	Define organizational structure with well-defined roles, responsibilities and authorities	JMTPL has a Project Manager deployed at site at Rajadhok Toll Plaza who overlooks all the activities pertaining to the maintenance and operation of the project corridor. He has a team, of which there is a compliance Office and HR & Administration Manager who look into the entire project Administration aspects. Also, there is a Store and Purchase, Quality control, Maintenance Engineer. However, there are no such dedicated teams such as Environment, Safety, HR, Land & Resettlement and CSR.	JMTPL should put in place a defined organisational structure for operations and maintenance including personnel from Safety, and Environment, etc. who are responsible for legal compliance as well as environmental and social performance of the project. Additional capability building will be required on the IFC Performance Standards and associated EHS Guidelines and how the same is applicable to the project. Training on the IFC Performance Standards and EHS Guidelines is recommended for their project SHE staff. JMTPL should appoint/designate personnel to manage the EHS and community issues along specific chainage of the road stretch.
1.6	Training to employees and contractors with direct responsibilities for activities related to the project's social and environmental performance	Trainings for employees and periodic audits for health and safety is conducted by JMTPL. Consultation with the JMTPL's field staff revealed that they face difficulty in implementing the same health and safety standards for their sub-contractors. A few of the sub-contractor agreements examined for this purpose shows that health safety standards to be adhered by them are not adequate. The training of the sub-consultants or smaller vendors and on site surveillance of health and safety measures has a definite scope of improvement.	<ul style="list-style-type: none"> The ESMP should include training systems to train the staff involved in the project during the operation phase; Training modules/programs should be identified for the operation phase of the project that includes modules on technical, induction, environmental, health & safety and social aspects for all employees (permanent/temporary and contracted).
1.7	Emergency Preparedness and Response: Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS will establish and maintain an	Formulation of on-site emergency response plan has been done by JMTPL as evident from review of documentation of Jaipur-Mahua through Safety Plan. Plans. Accident Data and Incident Management Reports are sent weekly to NHAI and IE_ LASA. NHAI through the Concession agreement has also specified for Pedestrian Guard Risk, Safety Barriers, Blinker Signals at	JMTPL should carry out an internal monitoring of the project road based on the requirements of the Concession Agreement in order to ensure the functioning of the safety practices. ERM recommends that IJM as the Parent Company

SN.	Requirements	Observation/Gap	Recommendation
	emergency preparedness and response system. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.	intersections and Truck Lay-byes. Also, as per the Concession Agreement, highway patrolling should have 3 shifts of 8 hours each. Based on the site visit, blinker signals were not seen at some of the intersections and Highway Patrolling vehicle was also not functioning in the period between 8.am to 6. pm.	should have an Incident Management System in Place for a detailed recording of the accidents – location, nature of accident, vehicles involved time of accidents etc, so that appropriate trends can be understood and corrective actions as much as possible can be taken. . This should also address the training, responsibilities, communication and Documentation Procedures.
1.8	Monitoring and Review: Establish procedures for monitoring and measurement of the effectiveness of the management programme.	Presently, the project lacks an effective mechanism to monitor and report on the EMP or on legal requirements, such as 6-monthly reports to compliance conditions.	The updated ESMP should define specific monitoring indicators, frequencies and other reporting requirements. A detailed monitoring plan for monitoring and reporting to regulators as well as to NHAI, parent company and IFC will need to be developed
1.9	Provision for internal reporting as well as external reporting on action plans. Where appropriate, client will consider involving representatives from Affected Communities to participate in monitoring activities.	JMTPL presently does not have any internal monitoring and external auditing procedures and checklists to monitor the regular activities of the sub-contractors and the maintenance workers.	Internal Monitoring reports and checklists and procedures should be established and developed as a part of the revised ESMP. Even though its an operational road, many of the ESMS processes will be initiated now, hence its appropriate to have monthly internal monitoring as well as external quarterly monitoring/reviews for the next 2 years. Beyond which the internal monitoring process should continue with reduced frequency, while external monitoring should be undertaken at least annually.
1.10	Stakeholder Engagement: The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.	Currently, there is no formal system for stakeholder engagement. Further , there is no disclosure process to provide timely information to the local communities and understand their concerns vis-à-vis the environmental and social impacts of the Project. JMTPL maintains a community grievance register to record complaints and issues from the community. However an Employee Grievance Redressal Mechanism was not present	JMTPL should develop a formal, structured and coordinated Stakeholder Engagement Plan and Process. This process should be developed in order to: <ul style="list-style-type: none"> • To provide a forum to elicit stakeholder feedback on mitigating impacts from the project in a timely basis, and involve public participation to the extent relevant and possible, in developing the project in future phases; • To develop common engagement strategies

SN.	Requirements	Observation/Gap	Recommendation
			<p>towards cultural heritage, vulnerable groups etc.</p> <ul style="list-style-type: none"> • Design and implement a Community Development Plan along the route, to focus on livelihood restoration and any other need that may have emerged, with priority given to the PAPs who lose land or income sources to the project, irrespective of their legal status; • As a part of the Community Development Plan, explore and provide opportunities for local employment where possible. • Monitor the implementation of the Community Development Plan to assure over a period of time that PAPs have restored their livelihoods.
1.11	<p><u>External Communications</u> Clients will implement and maintain a procedure for external communications that includes methods to:</p> <ul style="list-style-type: none"> (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; <p>In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.</p>	<p>JMTPL has provided for two complaint registers at the two plazas in Rajadhok and Sikandra. Display boards stating the availability of complaint registers at their respective locations are present at both toll plazas.</p>	<p>Same as above JMTPL should peruse NHAI for early settlement of the court cases and should develop the formal grievance redressal process, which provides for hassle-free reporting of grievance and set procedures for recording, addressing and timelines for redressal of community grievances. This will also need to be linked to existing mechanisms within NHAI's grievance procedures.</p>
2	<p>IFC PS 2 Labour and Working Conditions</p> <p>There are a total of 38 employees working under JMTPL and more than 300 employees who work under 10 different contractors (list provided below) for security, RoW maintenance, road maintenance, toll collection etc. JMTPL has an HR manual which is applicable to all the employees of the company including an expatriate employee who is on a secondment basis to the company. All workers are permanent and there are no women employees in JMTPL. There are four contracted women employees under Morkoline working at toll booths and several women (approximately 25) work for maintenance contractor. Presently the existing Contractor Management System is not sufficient to manage Environment & social issues however contractor agreements include Terms and conditions covering aspects related to Indian regulatory compliance to labour and other associated laws requirements of Company's safety manual and failure may in 'stopping work' or termination of the contract.</p>		
2.1	<p><u>Human Resources Policies and Procedures:</u> A Human Resources policy which sets out its</p>	<ul style="list-style-type: none"> • IJM has not constituted a separate HR Policy/manual for JMTPL and the IJM policies are applicable to JMTPL employees. 	<ul style="list-style-type: none"> • JMTPL should develop an HR Policy Statement that will outline its commitment to

SN.	Requirements	Observation/Gap	Recommendation
	approach to manage employees consistent with the requirement of this PS.	<ul style="list-style-type: none"> 	principles such as equal opportunity, workforce protection, compliance to legal requirements, grievance mechanism etc. for all employees and contractors.
2.2	The client will document and communicate to all employees and workers directly contracted, their working conditions and terms of employment, including entitlement to wages and benefits, hours of work, overtime arrangements and compensation etc.) where such agreements are respected. At the minimum comply with the national law.	<ul style="list-style-type: none"> There is no monitoring of terms and conditions attached in the contractor agreement in terms of E&S aspects. 	The key provision of the JMTPL should also be applicable for directly contracted workers, and the contractors should be encouraged to communicate to their employees their working conditions and entitlements.
2.3	<p><u>Working Conditions and Terms of Employment</u> Wages, benefits, hours of work, overtime arrangements and compensation, etc. at the minimum comply with the national law.</p> <p>These include, but are not limited to:</p> <ul style="list-style-type: none"> Factories Act, 1948; Building and Other Construction Workers Act, 1996; Payment of Wages Act, 1936 Employees' State Insurance Act, 1948; Employees' Provident Fund and Miscellaneous Provisions Act, 1952; Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979; Minimum Wages Act, 1948; Equal Remuneration Act, 1976 	<ul style="list-style-type: none"> It was reported that there were no working unions or association of the workers engaged as permanent or contract workers; There is a hot mix plant under the maintenance contractor and it was reported that workers and truck drivers usually stay inside the premises though not permanently. But rooms where workers stay overnight lacked proper ventilation and construction debris, oil waste and scrap metal were observed to be not stored in a proper manner leading to health and safety issues. 	<ul style="list-style-type: none"> JMTPL systems must include the monitoring of their sub-contractors on labour compliance and social aspects. It is suggested that the HR/Project Management team develop a detailed checklist to assess each contractor against the requirements of the applicable Indian labour laws as well as the requirements of IFC PS 2. The compliance to this checklist should be verified not just through review of documentation but also through discussions with the workforce. The compliance levels should show improvement in an agreed period of time. JMTPL should ensure that sub - contractors should provide adequate living conditions for its workers who stay over at its premises. This includes clean hygienic toilets, drinking water, proper bedding and ventilation in rooms where workers sleep.
2.4	The client will identify migrant workers and ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work.	<ul style="list-style-type: none"> Although most of the workers are from local areas, it was observed that some employees working at the Hot Mix plant under Krishna Infrastructure are from different states. The contractor has not taken license from the local employment office under Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 	<ul style="list-style-type: none"> JMTPL should ensure that their sub-contractors should have valid registration under Interstate Migrant Workers Act 1979 and in future to provide for better living conditions for migrant workers and

SN.	Requirements	Observation/Gap	Recommendation
		1979; .	compliance to national laws are done .As the hot mix plant will be present till the project life cycle for maintenance work, overlaying, road repair etc. the compliance of the same to labour laws is elementary.The contractor thus hired should be made responsible for all this, outlining these provisions in the contractor agreement.
2.5	Where accommodation services are provided to workers covered by the scope of this Performance Standard, the client will put in place and implement policies on the quality and management of the accommodation and provision of basic services. This also includes the applicable requirements of the IFC Guidelines on Worker Accommodation.	<ul style="list-style-type: none"> The living conditions at the premises were found to be inadequate in terms of waste management, ventilation, room size and bedding, toilet facilities. In addition, the roof of the hot mix plant building is made of asbestos which has issues related to its disposal. 	<ul style="list-style-type: none"> Housing of workers should be done as per IFC's guidelines on workers accommodation.
2.6	<u>Workers' Organizations</u> Where law recognizes worker's rights to form and join worker organizations of their choice without interference, and collectively bargain, the client will comply with the national law.	<ul style="list-style-type: none"> JMTPL does not have a policy or position around collective bargaining or the membership of its employees to a trade union. None of the workforce is affiliated to any worker organisation or trade union. 	<ul style="list-style-type: none"> The company should not discourage processes of collective bargaining. In case of no Trade Union, JMTPL should develop an alternative forum to raise grievances and workplace concerns in line with the mechanism suggested in Section 2.9.
2.7	<u>Non-Discrimination and Equal Opportunity</u> Non-discrimination and equal opportunity: Employment decisions will not be made on the basis of personal characteristics unrelated to job requirements. Job opportunities will be provided on the principles of equal opportunity and fair treatment. The principles of non-discrimination apply to migrant workers.	<ul style="list-style-type: none"> The HR Manual reviewed does not state non-discrimination and equal opportunity in recruitment, performance management etc.. Based on the discussions, it was observed that there were discrepancies in wages between the male and female workers in maintenance work. Based on consultations with maintenance workers, it was reported that unskilled female workers get a daily wage in the range of INR 220-250 while an unskilled male gets paid a daily wage of INR 250-300. 	<ul style="list-style-type: none"> JMTPL should verify the terms of payment to male and female workers and if found guilty subcontracts should be penalised. Further develop mechanism to ensure the equal treatment of workers.
2.8	<u>Retrenchment</u> A plan to mitigate the adverse impacts of retrenchment on employees to be in place if required. The client should ensure that all	<ul style="list-style-type: none"> The corporate HR Manual does not make any mention of a retrenchment policy and any benefits to mitigate the adverse impacts of the project. Further is was reported that staff are terminated without given adequate time in advance. 	<ul style="list-style-type: none"> JMTPL/IJM must revise its HR policies to include a strategy on retrenchment and redeployment in accordance to IFC's Good Practice Note on Managing Retrenchment.

SN.	Requirements	Observation/Gap	Recommendation
	workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments.		
2.9	<u>Grievance Mechanism</u> Grievance mechanism for workers where they can raise reasonable workplace concerns.	<ul style="list-style-type: none"> A formal Grievance Redressal Mechanism was not reported be present . 	<ul style="list-style-type: none"> JMTPL should formulate a grievance redressal system and extend it to all contractors and their workers so that any grievances associated with their working conditions, accommodation facilities or any commissions/omissions by the contractor/sub-contractor get documented for receipt, action, and closure and employee/worker satisfaction. The Contractor's performance indicators should include effective management of grievances.
2.10	Protecting the Work Force: <u>Child Labour</u> The client will not employ children in a 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 development. All work of persons under the age of 18 will be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work. .	<ul style="list-style-type: none"> HR processes and commitments do not explicitly state the non-tolerance to employment of child labour. The Contractual Agreements do not state non employment of child labour as well. 	<ul style="list-style-type: none"> JMTPL should incorporate non deployment of child labour clause in its contractor agreements clearly.
2.11	<u>Forced Labour</u> The client will not employ forced labour, which consists of any work or service not voluntarily performed and that is extracted for an individual under threat of force or penalty. The client will not employ trafficked persons.	<ul style="list-style-type: none"> No such incidence were reported 	<ul style="list-style-type: none"> A clearly stated policy detailing the company's opinion on forced labour is warranted.
2.12	Occupational Health & Safety The client will take steps to prevent accidents,	<ul style="list-style-type: none"> Maintenance workers are not having the proper safety gears (PPE's) as per the requirement of their jobs. 	<ul style="list-style-type: none"> JMTPL should appoint an EHS officer assisted by dedicated team of EHS

SN.	Requirements	Observation/Gap	Recommendation
	<p>injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards.</p> <p>In a manner consistent with good international industry practice, as reflected in various internationally recognized sources including the World Bank Group Environmental, Health and Safety Guidelines, the client will address areas that include the</p> <ul style="list-style-type: none"> (i) identification of potential hazards to workers, particularly those that may be life-threatening; (ii) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) training of workers; (iv) documentation and reporting of occupational accidents, diseases, and incidents; and (v) emergency prevention, preparedness, and response arrangements. 	<ul style="list-style-type: none"> • It was observed that incident/accident reporting is only limited to road accidents and does not cover incidents/accidents occurring during maintenance or site work. 	<p>personnel.</p> <ul style="list-style-type: none"> • Include provisions of health and safety as indicated within the IFC Performance Standards, Factories Act and subsequent rules • All workers should be provided with adequate PPEs and periodic training should be provided to them for usage of PPEs; • Prepare emergency plans and train staff for emergency situations. • In addition, there should be improvement in analysis of first aid cases and near misses in order to take preventive actions. • A segment on Occupational Health & Safety should be added in the Project Safety Plan. • There should be a proper reporting system to report near misses, accidents, injuries and investigations into the same.
2.13	<p><u>Workers Engaged by Third Parties:</u> The client will establish policies and procedures for managing and monitoring the performance of such third party employers in relation to the requirements of PS2. In addition, the client will use commercially reasonable efforts to incorporate these requirements in contractual agreements with such third party employers.</p>	<ul style="list-style-type: none"> • JMPTPL does not have a system for managing the EHS performance of their sub-contractor. 	<ul style="list-style-type: none"> • JMPTPL should establish a formal EHS Contractor Management system with a structure of Performance Evaluation and Monitoring of Contractors and on aspects such as protection of work force, statutory compliance of wages and benefits, occupational health & safety etc.
2.14	<p><u>Supply Chain</u> Impacts associated with supply chains will be considered where low labour cost is a factor in competitiveness of the item supplied.</p>	<ul style="list-style-type: none"> • Presently JMPTPL 's Quality Management System, this does not include vendor and supply chain assessment or source approval for construction material that pertains to protection of the work force or occupational health & safety. 	<ul style="list-style-type: none"> • JMPTPL should identify the primary suppliers and include them in their monitoring for at least some key labour and health and safety related issues. There should be an internal audit program for all primary suppliers.

SN.	Requirements	Observation/Gap	Recommendation
3	IFC PS 3: Pollution Prevention and Abatement		
3.1	The client will consider ambient conditions and apply technically and financially feasible resource efficiency and pollution prevention principles and techniques that are best suited to avoid, or where avoidance is not possible, minimize adverse impacts on human health and the environment. The principles and techniques applied should be consistent with good international industry practice as reflected in various internationally recognized sources, including the World Bank Group Environmental, Health and Safety Guidelines.	JMTPL has prepared an Environmental Management Plan (EMP) prepared in March 2006 for the execution of the BOOT road project. This Plan covers only the construction phase related activities and impacts but operational phase impacts and mitigation measures are not included in the EMP. Currently, there is no Operational Phase Environment and Social Management Plan for the project that is being implemented by JMTPL. The EMP also does not cover maintenance activities during operation phase such as median and avenue plantation, ROW vegetation, storm water drain management etc. Also, as a part of the EIA report prepared in 2003, there is no Environmental and Social Management Plan and Monitoring Plan for monitoring of environment parameters during the construction and operation phase of the project.	JMTPL needs to update the EMP to a revised ESMP incorporating all the environment, social, health and safety risks and impacts, their associated mitigation plan and monitoring plan for the operation phase.
3.2	The client will refer to the EHS Guidelines or other internationally recognized sources, as appropriate, when evaluating and selecting resource efficiency and pollution prevention and control techniques for the project.	Compliance with respect to EHS guidelines has been presented in Table 6.2	See Table 4.2
3.3	Pollution Prevention: To avoid release of pollutants or when avoidance is not feasible minimize or control the intensity or load of the release. To address potential adverse project impacts on existing ambient conditions, the client will consider relevant factors, including, for example <ul style="list-style-type: none"> existing ambient conditions; the finite assimilative capacity of the environment; existing and future land use; the project's proximity to areas of importance to biodiversity; and the potential for cumulative impacts with uncertain and/or irreversible consequences. 	As mentioned above, the project does not have an Environment Monitoring Plan in place for monitoring the ambient conditions. The following environmental non-compliances were observed with respect to the present road project: <ul style="list-style-type: none"> Ambient Air and Noise monitoring is presently not being undertaken along the project road near to the sensitive locations such as schools, hospitals, reserve forest areas. However, the EC mentions that all then conditions laid down by state Pollution Control Board need to be followed. Poor maintenance of carriageway leading to unmanaged solid waste on ROW edges and median; Poor maintenance of carriageway leading to clogging of ROW drains and stagnant water standing at places near to marble crafts workshop due to waste water disposal from their activities; As the Impact Assessment section was not included in the EIA report, it could not be verified, if vegetative and structural barriers near to sensitive receptors like schools and hospitals were proposed or not as it was evident from the site assessment, mitigation measures provided to such receptors was inadequate. 	<i>For the Project Road:</i> <ul style="list-style-type: none"> JMTPL should follow the specific conditions as specified in the NOC obtained from RSPCB; Ambient Air and Noise Monitoring Should be carried out along the project corridor at locations near to sensitive receptors; Periodic maintenance of carriageway for appropriate solid waste removal and drain management should be carried out by the subcontractor. JMTPL should regularly monitor the activities of the maintenance contractor; JMTPL should monitor the noise impacts at the sensitive receptor location and provide control measures like vegetative barriers/structural barriers at such location

SN.	Requirements	Observation/Gap	Recommendation
		<p>For the bitumen overlaying, a hot mix plant has been built by the sub-contractor, approximately 3 km away from the centreline of the project road. However the following non-compliances were observed with respect to the hot mix plant :</p> <ul style="list-style-type: none"> • The plant is being operated by a sub-contractor named , Krishna Infrastructure. Consent to Establish and Consent to Operate has not been obtained by the sub-contractor and JMTPL has also not enforced the process; • As a result, the conditions to be laid down in CTO for operating a Hot Mix Plant could not be assessed; • Significant quantities of diesel spillage at the Hot Mix plant , posing a threat to groundwater contamination; • Quantity of diesel consumption could not be analysed as data was not made available by the sub-contractor; • Diesel containers were stored in open posing potential risk of contamination of soil and groundwater; • Solid waste was observed to be dumped at one corner inside the Hot Mix plant. The site management of Krishna contractor was not aware of the disposal mechanism; • There was no plantation done on the periphery of the Hot mix plant. 	<p>to avoid impacts on the community.</p> <ul style="list-style-type: none"> • Marble craftsmen located inside ROW should not be allowed release wastewater into the ROW drains; • Collecting and returning swept material to aggregate base or disposing as solid waste. <p><i>For Hot Mix-Plant:</i></p> <ul style="list-style-type: none"> • CTO has to be obtained for the Hot Mix Plant; • A suitable and adequate dust control system such as dry and wet scrubber for the Dryer and mixer shall be provided; • Hot Mix plant must have adequate stack height (atleast 6 meter) for the discharge of its scrubbed flue gases ; • Water sprinkling system shall be provided for suppression of dust in the premises; • Adequate plantation shall be carried out in the periphery of premises. • Diesel drums at the Hot mix plant should be stored on a paved surface provided with a shed and drip tray shall be provided while transferring diesel; • JMTPL should ensure that the sub-contractor maintains proper documentation of the diesel consumption; DG sets capacities, fuel source and adheres to RSPCB requirements.
3.4	<p><u>Wastes:</u> To avoid and minimize generation of hazardous and non-hazardous waste materials as far as practicable. Where waste generation cannot be avoided, but has been minimized, the client will recover and reuse wastes, where wastes cannot be recovered or reused, the client will treat, destroy and dispose of in an environmentally sound</p>	<p>During the site visit, it was observed that majority of the stretches had deposition of domestic waste on medians and on the roadside edge. Animal (cow and reptiles like monitor lizards) carcasses were also observed in some sections along the edge of the road.</p> <p>Also, painting activities were carried out by the sub- contractor workers as a part of maintenance activity during the field visit. However, old paint was not removed and no scraping operation was undertaken. Bitumen overlaying activity was carried out by some of the sub-contractor workers on the ROB and the embankment of the ROB was scattered with domestic waste, plantation</p>	<p>Maintenance activities should be carried out in a comprehensive manner for the entire length of the project road. JMTPL should ensure cleaning of the roadside and median regularly to avoid dumping and maximizing of road side waste.</p> <p>Waste from the median and the ROW should be regularly removed and maintained by the sub-contractors. JMTPL should ensure the regular</p>

SN.	Requirements	Observation/Gap	Recommendation
	manner. If the generated waste is considered hazardous, the client will explore commercially reasonable alternatives for its environmentally sound disposal, considering the limitations applicable to its trans-boundary movement.	cuttings, trimmed shrubs of the ROW. Based on the discussions with the maintenance workers, it was understood that during the maintenance activities of a particular stretch, either for the median or ROW, the waste is being collected by dedicated tractors which further dump it to a designated site in the premises of the sub-contractor. However, during the site visit, it was observed that the carriageway maintenance in terms of waste removal from the median, carriageway edge was not adequately managed.	monitoring of the sub-contractor activities.
3.5	<u>Hazardous Materials Management:</u> The client will avoid or, when avoidance is not possible, minimize and control the release of hazardous materials. In this context, the production, transportation, handling, storage, and use of hazardous materials for project activities should be assessed. The client will consider less hazardous substitutes where hazardous materials are intended to be used in manufacturing processes or other operations.	Key hazardous chemicals being handled by of JMTPL include diesel and transformer oil. Hazardous wastes being generated include used/ spent oil and discarded containers of diesel. The hot bitumen mixes are prepared in Hot Mix plants. These plants are not in operation continuously .But they are operating as and when demand is generated. Bitumen handling without inadequate PPE is considered unsafe and it was observed that at site bitumen handling was being done without use of appropriate PPEs.	JMTPL should ensure that the sub-contractor disposes used oil as per the conditions stipulated by RSPCB. Adequate measures of safety for workers working in Hot Mix plant shall be taken. Personal Protective Devices such as Goggles, mask, helmet and safety shoes shall be provided to workers.
3.6	<u>Pesticide Use and Management:</u> Formulate and implement an integrated pest management (IPM) and or integrated vector management (IVM) approach to pest management.	Pest management is not being carried out anywhere and neither have the requirements of pest management been addressed in the EMP. During the site assessment, it was understood that the road side drains, median were likely to develop pests and infect the surrounding ,likely to cause community hazards	<ul style="list-style-type: none"> • The ESMP should have a vector management plan and suggest processes and approach to this; • Pest management may be required at toll plaza office, even on median plantation or at stagnated clogged water drains • JMTPL shall ensure through its policy, not to use any banned/ prohibited Pesticides or vector control chemicals.
3.7	Be prepared to respond to process upset, accidental and emergency situations in a manner appropriate to the operational risks and the need to prevent their potential negative consequences. This preparation will include a plan that addresses the training, resources, responsibilities, communication, procedures and other aspects.	Formulation of on-site emergency response plan has been done by JMTPL as is evident from review of documentation of Jaipur-Mahua project road through Safety manuals and Incident Response Plans. Accident Data and Incident Management Reports are sent weekly to NHAI and IE_ LASA. NHAI through the Concession agreement has also specified for Pedestrian Guard Risk, Safety Barriers, Blinker Signals at intersections and Truck Lay-byes. Also, as per the Concession Agreement, highway patrolling should have 3 shifts of 8 hours each. Based on the site visit, blinker signals were not seen at some of the intersections . Also, during the 3 day visit of ERM, the Highway Patrolling	JMTPL should carry out an internal monitoring of the project road based on the requirements of the Concession Agreement in order to ensure the functioning of the safety practices. ERM recommends that IJM as the Parent Company should have an Incident Management System in Place. This should also address the training, responsibilities, communication and Documentation Procedures. This can be followed

SN.	Requirements	Observation/Gap	Recommendation
		vehicle was also not observed to be functioning at any section , atleast, not between 8.am to 6. pm.	through site activities.
3.8	<p><u>Greenhouse Gases:</u> The client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project. For projects that are expected to or currently produce more than 25,000 tonnes of CO₂-equivalent annually, the client will quantify direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project.</p>	JMTPPL does not record the total amount of GHG emissions that might result from the number of vehicles plying on the road on monthly basis. The road is used by a significant number of motorised vehicles on daily basis including multi-axle vehicles. However the direct mobile sources are not being recorded for their estimation of diesel consumption and carbon-dioxide equivalents.	JMTPPL should estimate the total GHG emissions in terms of CO ₂ equivalents that are released from the total number of motorised vehicles that ply on the project road on monthly basis.
4	<p>IFC PS 4: Community Health, Safety and Security This section reviews available information to describe JMTPPL's systems to identify any community, health & safety risks during the road operations, to implement preventive measures and to monitor their effectiveness. Specific aspects that have been considered include:</p> <ul style="list-style-type: none"> • Traffic management and minimizing nuisance to local communities during maintenance activities; • Minimizing any adverse impacts to utilities like Electric Transmission Towers or to their access during diversion and shifting; and • Implementation of the Emergency Response Plan etc. 		
4.1	The client will evaluate the risks and impacts to the health and safety of the Affected Communities during the project life-cycle and will establish preventive and control measures consistent with good international industry practice (GIIP), such as in the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) or other internationally recognized sources.	<p>JMTPPL has a Safety Plan but no Emergency Response Plan . JMTPPL maintains accident records through computerised system but an automated information system like Highway Traffic Management System (HTMS) is not being used. ISOS services are not provided all along the entire Project corridor, except that the emergency contact numbers are displayed intermittently along the project corridor. JMTPPL does not carry out a Safety Awareness Campaign for the nearby community.</p> <p>As per the DPR, there should be 5 cattle/pedestrian underpasses . However the EC specifies that there should be 12 underpasses in place of 5. It was observed during the site visit that the number of cattle underpasses were inadequate considering the fact that the Project corridor encounters sections with cattle movement in masses. It was observed that there were no warning signs to alert drivers on road segments where animals frequently cross.</p> <p>Pedestrian crossings were also found to be without zebra crossings all along the entire length of the project corridor.</p>	<ul style="list-style-type: none"> • JMTPPL should ensure to install measures to reduce collisions between animals and vehicles through construction of adequate animal crossing structures in the second section, installation of fencing along the roadway to direct animals toward crossing structures and use of reflectors along the roadside to deter animal crossings at night when vehicles are approaching. • JMTPPL should also ensure installation of barriers like fencing and plantings to deter pedestrian access to the roadway except at designated crossing points. • What about a review of all the signages, especially around schools and settlements and ensure that there are appropriate and adequate signage at all sections of the road

SN.	Requirements	Observation/Gap	Recommendation
			and the community is trained on the meaning of such signs.
4.2	Client will avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups.	Refer 3.3 of Table 4.1	Refer 3.3 of Table 4.1
4.3	Where client retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by its security arrangements to those within and outside the project site.	JMTPL has nine sub-contractors for various activities but the ESMP does not indicate any provisions for the training/selection/recruitment of security personnel. The security contractors engage total of 60 workers for security working for M/s Shivam Security Services and M/s Vijay Ex-servicemen Welfare Co-operative Society Ltd.	The revised ESMP should specify the training requirements for security personnel with emphasis on community health & safety concerns as well as for dealing with the community during emergencies like accidents or property damage. .
5	<p>IFC PS 5: Land Acquisition and Involuntary Resettlement</p> <p>The land has been acquired under appropriate sub-sections of NH act 1956. And R&R of project affected persons was done as the provisions of NH Act 1956. The majority of the land acquisition was completed in 2008 and project road having commercial operation since sept 2009. However there are still few patches of land where land acquisition could not be completed on account of ongoing litigations and objection from their respective owners. For details refer to section 3.5.2 and table 3.10. In the light of the present context, PS-5 can be partially triggered under specific conditions.</p>		
5.1	<p>Private Sector Responsibilities Under Government-Managed Resettlement</p> <ul style="list-style-type: none"> The client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this Performance Standard In the case of acquisition of land rights or access to land through compulsory means or negotiated settlements involving physical displacement, the client will identify and describe government resettlement measures. If these measures do not meet the relevant requirements of this Performance Standard, the client will prepare a Supplemental Resettlement Plan 	<p>There are 197 reported cases of encroachment which was verified including punch listed items. These cases includes individual and group structures specially in market areas, where reportedly there are 20 cases whose compensation is withheld on account of ongoing litigation in the court of law, 14 cases where owners claimed that they were not compensated for some part of affected structure or land, 13 cases where owners have received the compensation but have not removed structures. Further it was found that there are habitations like Bagrana located at ch : 221.800- 223.000 where there are nearly 30 affected residential structures and Bandana at ch 194.650 – 700, where there are 8-10 structures located at the present locations since a long time (reported 20-30 years or more). However they did not have adequate documents as a proof their ownership. Currently none of the cases related to compensation issues have been removed from ROW nor does any notice for eviction have been given to them currently status quo is maintained.</p>	<ul style="list-style-type: none"> In cases of court cases the company is not expected to take any additional actions. The legal process will define what needs to be done. 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. These will entail undertaking a SIA and developing a supplemental RAP 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.

SN.	Requirements	Observation/Gap	Recommendation
7	IFC PS 7: Indigenous Peoples	<p>NHAI PD informed that some of the land acquired was from Scheduled Tribe families, specifically the Meena community. Lack of household level land and compensation data did not allow as assessment of the proportion of tribal land acquired or the specific significance of impacts on tribal families. However, the provisions of IFC PS 7 on Indigenous Peoples and specifically on Free, Prior and Informed Consent (FPIC) and IPDP do not get triggered due to the following reasons:</p> <ul style="list-style-type: none"> • No section of the project road goes through designated Schedule V areas. • While the <i>Meena</i> community is a scheduled tribe, within the social context of the project, this community group is well integrated and mainstreamed and could not be considered as marginalized or vulnerable as a group, even though individual households could fall into that category, in the same manner as a family from a non-tribal family could. . Any potential economic impacts from the land acquisition on the Meena community are likely to be similar in intensity as compared to other impacted entities; • Random assessment of limited available data from the various tehsils suggests that the proportion of tribal land to the total land acquired would be small. However this assessment is based on a very small sample data and is only being used to demonstrate a trend. • The project will invest in community development programmes along the road, focusing on sections where there is significant land acquisition 	
8	IFC PS 8: Cultural Heritage	<p>Reportedly the proposed alignment of the project road near Ghat Kid Gun in between Km 228- 233 ,passes though the sites of archaeological importance however negative impacts are avoided if any by not acquiring additional land and construction of road is limited to strengthening without widening the existing road. Therefore applicability of this PS is limited.</p>	

The Environmental and Social Action Plan (ESAP) for the Jaipur- Mahua Road Project has been structured to address the identified gaps against the Applicable Standards using the structure of the ESDD Screening Criteria elements. The structure of the ESAP has taken into account its requirement to be incorporated into the loan documentation; to facilitate its use by the project proponents; and to facilitate the verification of ongoing compliance.

The ESAP has been structured to include the following:

- Recommendations and actions to address the gaps identified against the applicable standards;
- Indication of responsibilities for implementation;
- Highlighting the need for additional staff, skills, and consultancy support to build systems and develop capacity;
- Realistic timeline for the completion of the actions required; and
- Indication of the documentation to be produced (where relevant) for verifying completion.

The ESAP has to the extent feasible, suggested measures to build upon the existing assessment documentation that is available either with JMTPL or ISC.

As required by the IFC for Category B projects:

- The ESAP should become part of covenants within the Project;
- The Project will need to regularly monitor and report the progress of ESAP implementation; and
- The implementation of the ESAP will need to be monitored by an independent/third-party environmental and social expert/ organization at least once every year.

Note:

- Actions that are outside the scope of JMTPL have not been included in the ESAP.

The Environmental and Social Action Plan for the Jaipur-Mahua Road Project has been provided in *Table 5.1* *Error! Reference source not found.* :

Table 5.1 Environmental and Social Action Plan for JMTPL

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Reference	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion
1	Compliance				
1.1	JMTPL should ensure that the sub-contractor obtains a Consent to Establish and Consent to Operate for the Hot Mix Plant from the RSPCB	Pt. 1 of Table 4.1	JMTPL along with Sub-contractor	CTE/CTO License	Immediate
2	Assessment and Management of Environment and Social Risks and Impacts				
2.1	<p>JMTPL should develop an Environment and Social Management System (ESMS) for covering road operations, maintenance and management. The ESMS manual should cover the following aspects:</p> <ul style="list-style-type: none"> • Key environment , social and health and safety issues associated with the road operations ; • Environmental, Social, Health and Safety Policy; • Legal Framework including Legal register; • Site Specific Risk Assessment in the form of Revised ESMP; • Risk Assessment for sections involving widening/expansion; • Environment and Social Risk Assessment and Management Plan for the entire project, with site specific and issue specific plans focussing on the main issue like safety, community H & S, drainage management, traffic management and patrolling, safe passage to community, cattle and wildlife, stakeholder engagement and management, grievance redressal, etc. ; • Training Plan and Systems; • ESMS Organization Structure; and • Internal & External Monitoring and Reporting plan 	Pt. 1.1 to 1.8 of Table 4.1	JMTPL	<ul style="list-style-type: none"> • ESMS Manual; • Environmental, Social, Health and Safety Policy; • Revised ESMP; • Legal Register; • Training Records; • Internal Monitoring Records and Reports 	Immediate
3	Resettlement Action Plan (RAP)/CSR Plan				
3.1	JMTPL should develop Community Development plan for the project focussing on areas where the maximum land acquisition has been done.	Pt. 5 of Table 4.1	JMTPL	Community Development Plan	Within 2 months
3.2	<p>There were some locations identified by ERM as potential cases for encroachment or pending litigations and compensation issues for any future displacement of the occupants will entail a need for an SIA and RAP and</p> <p>A. In cases of court cases the company is not expected to take any additional actions. The legal process will define what needs to be done.</p> <p>B. 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>C. For encroachments being removed, the company needs to monitor and document the process (to the extent possible), and ensure that in cse there are reasons for grievances, the affected person is provided access to the GR</p>	Table 3.10 of Chapter 3 & pt 5 Table 4.1	JMTPL/NHAI	SIA/RAP if eviction of encroachers is planned or taken up	Before any future eviction/displacement/ acquisition

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Reference	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion
	mechanism.				
3.3					
4	Stakeholder Engagement/Grievance Mechanism				
4.1	<p>JMTPL should develop a formal, structured and coordinated Stakeholder Engagement Plan and Process with a focus on vulnerable communities under PS 1.. This process should be developed in order to:</p> <ul style="list-style-type: none"> To provide a forum to elicit stakeholder feedback on mitigating impacts from the project in a timely basis, and involve public participation to the extent relevant and possible, in developing the project in future phases; To develop common engagement strategies and plans towards cultural heritage, vulnerable groups etc. JMTPL should formulate a grievance redressal system and extend it to all contractors and their workers so that any grievances associated with their working conditions, accommodation facilities or any commissions/omissions by the contractor/sub-contractor get documented for receipt, action, and closure and employee/worker satisfaction. The Contractor's performance indicators should include effective management of grievances. 	Pt. 1 of Table 4.1	JMTPL	Stakeholder Engagement Plan and Process and Grievance Redressal Mechanism for all employees including contract workers	Within 2 months
6	Health & Safety				
6.1	<ul style="list-style-type: none"> JMTPL should appoint an EHS officer assisted by dedicated team of EHS personnel. Include provisions of health and safety as indicated within the IFC Performance Standards, Factories Act and subsequent rules All workers should be provided with adequate PPEs and periodic training should be provided to them for usage of PPEs; Prepare emergency plans and train staff for emergency situations. In addition, there should be improvement in analysis of first aid cases and near misses in order to take preventive actions. A segment on Occupational Health & Safety should be added in the Project Safety Plan. There should be a proper reporting system to report near misses, accidents, injuries and investigations into the same. Adequate number of signboards should be provided at sensitive locations; Regular monitoring should be done in terms of multi-axle vehicles not to be parked within the carriageway; 	Pt. 2.12 of Table 4.1 and Table 4.2	JMTPL	<ul style="list-style-type: none"> Appointment Letter of EHS Officer; Physical Verification 	Within 2 months

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Reference	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion
	<ul style="list-style-type: none"> Training to subcontractor workers for health and safety aspects related to working on the carriageway maintenance 				
7	HR/ Contractor Management				
7.1	<ul style="list-style-type: none"> JMTPL should consider developing an HR Policy Statement that will outline its commitment to principles such as equal opportunity, workforce protection, compliance to legal requirements, grievance mechanism etc. for all employees, contractors and workers. JMTPL systems must include the monitoring of smaller contractors who may have lesser capacity on labour compliance and social aspects. It is suggested that the HR/Project Management team develop a detailed checklist to assess each contractor against the requirements of the applicable Indian labour laws as well as the requirements of IFC PS 2. The company should not discourage processes of collective bargaining. In case of no Trade Union, JMTPL should develop an alternative forum to raise grievances and workplace concerns in line with the mechanism suggested in Section 2.9. JMTPL must verify that their HR Policies demonstrate non-tolerance child labour, forced labour or to any discrimination on employment decisions and encourage equal opportunity in their recruitment notices, etc. 	Pt. 2 of Table 4.1	JMTPL	Revised HR Policy statement and Physical Verification	Within 2months
7.2	<ul style="list-style-type: none"> While construction activities are over, for maintenance work JMTPL should ensure adequate conditions in Hot Mix Plant, registration as per the Interstate Migrant Workers Act 1979 in future to provide for better living conditions for migrant workers and compliance to national laws. The contractor thus hired should be made responsible for all this, outlining these provisions in the contractor agreement. Condition of rooms where workers stay overnight on a temporary basis should be improved to provide adequate facilities related to hygiene, sanitation, safety, ventilation and cleanliness 	Pt. 2 of Table 4.1	JMTPL	Physical Verification	Immediate
7.3	<ul style="list-style-type: none"> JMTPL/IJM must revise its HR policies to include a strategy on retrenchment and redeployment in accordance to IFC's Good Practice Note on Managing Retrenchment. 	Pt. 2 of Table 4.1	JMTPL	Retrenchment Policy	Within 2 months
7.4	<ul style="list-style-type: none"> JMTPL should establish a formal Contractor Management system with a structure of Performance Evaluation and Monitoring of Contractors and on aspects such as protection of work force, statutory compliance of wages and benefits, occupational health & safety etc. The alignment of contractor management systems for all subcontractors will be the responsibility of JMTPL as the principal employer. Primary suppliers should be identified and monitored for key labour and health 	Pt. 2 of Table 4.1	JMTPL	Contractor Management system and documents/records	Within 2 months

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Reference	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion
	and safety related issues				
8	Pollution Prevention				
8.1	<p><i>For the Project Road:</i></p> <ul style="list-style-type: none"> JMTPL should follow the specific conditions as specified in the NOC obtained from RSPCB; Ambient Air and Noise Monitoring Should be carried out along the project corridor at locations near to sensitive receptors; Periodic maintenance of carriageway for appropriate solid waste removal and drain management should be carried out by the subcontractor. JMTPL should regularly monitor the activities of the maintenance contractor; JMTPL should monitor the noise impacts at the sensitive receptor location and provide control measures like vegetative barriers/structural barriers at such location to avoid impacts on the community. Marble craftsmen located inside ROW should not be allowed to release wastewater into the ROW drains; Collecting and returning swept material to aggregate base or disposing as solid waste. <p><i>For Hot Mix-Plant:</i></p> <ul style="list-style-type: none"> CTO has to be obtained for the Hot Mix Plant; A suitable and adequate dust control system such as dry and wet scrubber for the Dryer and mixer shall be provided; Hot Mix plant must have adequate stack height (atleast 6 meter) for the discharge of its scrubbed flue gases ; Water sprinkling system shall be provided for suppression of dust in the premises; Adequate plantation shall be carried out in the periphery of premises. Diesel drums at the Hot mix plant should be stored on a paved surface provided with a shed and drip tray shall be provided while transferring diesel; JMTPL should ensure that the sub-contractor maintains proper documentation of the diesel consumption; DG sets capacities, fuel source and adheres to RSPCB requirements. 	Pt. 3 of Table 4.1	JMTPL	Air and Noise Monitoring reports Physical Verification; NOC from RSPCB; Diesel Estimation Records; CTE/CTO form RSPCB	Immediate
8.2	Maintenance activities should be carried out in a comprehensive manner for the entire length of the project road. JMTPL should ensure cleaning of the roadside and median regularly to avoid dumping and maximizing of road side waste.	Pt. 3 of Table 4.1	JMTPL	Physical Verification	Immediate

SN.	Recommendation Action/Corrective Measure against the ESDD Screening Criteria	Reference	Responsibility and Resources	Measurable Outcome/ Documentation	Target Timelines for Completion
	Waste from the median and the ROW should be regularly removed and maintained by the sub-contractors. JMTPL should ensure the regular monitoring of the sub-contractor activities.				
8.3	JMTPL should ensure that the sub-contractor disposes used oil as per the conditions stipulated by RSPCB. Adequate measures of safety for workers working in Hot Mix plant shall be taken. Personal Protective Devices such as Goggles, mask, Helmet and safety shoes shall be provided to workers.	Pt. 3 of Table 3.1	JMTPL	Physical Verification; Training records	Immediate
8.4	JMTPL should estimate the total GHG emissions (GHG inventory) in terms of CO2 equivalents that are released from the total number of motorised vehicles that ply on the project road on monthly basis.	Pt. 3.8 of Table 4.1	JMTPL	GHG Inventory/Register	Within 2 months
9	Natural Habitats				
9.1	<ul style="list-style-type: none"> JMTPL should undertake a Road Kill program to identify the stretches and the zones where exactly the reptile accidents occur or for any other wildlife movements and collisions. Based on the results of the assessment, mitigation measures like installation of signboards, speed breakers should be provided in the respective chainages; Compliance to Forest Clearance Conditions 	Pt. 6 of Table 4.1	JMTPL	Road Kill Monitoring report Regular monitoring onsite.	Immediate
10	Indigenous peoples, tribes and communities				
10.1	ISC should invest in community development programmes, engaging with the project affected people along the road, with specific emphasis on sections where there was maximum land acquisition, hence maximum impacts.	Pt. 7 of Table 4.1	JMTPL	Record verification	Within 3 months
11	Cultural Heritage				
11.1	Undertake Community Consultations for all the Cultural properties falling in the Punch Listed items prior to relocation of the property from the ROW .	Pt. 8 of Table 4.1	JMTPL	Documented cultural heritage sites records	Within 2 months
11.2	Allocate budget for enhancement as well as ceremonial customs.	Pt. 8 of Table 4.1	JMTPL	Budget Sheet	Within 2 months
11.3	Signboards and Markings should be provided at the location of cultural property	Pt. 8 of Table 4.1	JMTPL	Physical Verification	Within 2 months
12.	Others				
12.1	<ul style="list-style-type: none"> Noise Monitoring to be undertaken as per the conditions provided in the NOC obtained by RSPCB; Noise barriers along the border of the right-of way (e.g. earthen mounds, walls, and vegetation. 	Pt. 1.7 of Table 4.2	JMTPL	Noise Monitoring Reports; Physical Verification	Within 2 months

Annex A

Photo Documentation

Photo-documentation



Photo 1: Kiosk at Km 228 on RHS



Photo 2: Abandoned Temple Structure within ROW on RHS

Project: Environmental & Social Due Diligence of Jaipur-Mahua Project Road

Client: GMS #: I10429/0258116 I-Squared Capital

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Photo-documentation



Photo 3: Dargah on RHS within ROW-Punch List Item



Photo 4: Labour Camps within ROW on RHS towards Jaipur

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Photo-documentation



Photo 5: Consultations with Labour Camps on RHS



Photo 6: Service Road near Kanota

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Photo 7: Poor maintenance of ROW on RHS



Photo 8 Cultural Property within ROW on RHS

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Photo-documentation



Photo 9: Cultural Property on RHS



Photo 10: Major Bridge on Dhundh River

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Photo-documentation



Photo 11: Uncontrolled Access to vehicles



Photo 12: Consultations with a local villager at Punch List item-Temple Falling in between the service road.

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Photo-documentation



Photo 13: Maintenance workers without adequate PPE working in the carriageway



Photo 14: Cattle movement inside the carriageway.

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Photo-documentation



Photo 15: Tractor loaded with marble stones tilted over on the main Carriageway, no monitoring by JMTPL



Photo 16: Poor Solid waste management and poor maintenance of the ROW

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Photo-documentation



Photo 17: Sub-contractor maintenance workers without adequate PPE



Photo 18: Mutil-axle vehicles parked inside the ROW

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Photo 19: Cattle movement in the carriageway



Photo 20: Bitumen-Overlaying contractors provided without adequate PPE on the ROB, no safety cones, no flagmen.

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Photo 21: Side Drainage blocked due to Marble craftsmen activities



Photo 22: Side Drainage blocked due to Marble craftsmen activities

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Photo 23: Reptile Carcass of Monitor Lizard



Photo 24: School Children crossing the road, section without adequate road sign and crossing

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Photo-documentation



Photo 25: Hot-Mix Plant by Krishna Infrastructure



Photo 26: Diesel Spillage on ground causing soil contamination

Project: Environmental & Social Due Diligence of Jadcherla Expressway

Client: SBI Macquarie

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Photo-documentation



Photo 27: Multi-Axle vehicles parked inside the carriageway



Photo 28: Multi-Axle vehicles parked inside the carriageway

Project: Environmental & Social Due Diligence of Jaipur-Mahua Project Road

Client : GMS #: I10429/0258116 I-Squared Capital

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Photo-documentation



Photo 29: Primary Health Centre on LHS falling within ROW



Photo 30: Road side drainage blocked due to marble craftsmen activities

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Client : GMS #: I10429/0258116 I-Squared Capital

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Photo-documentation



Photo 31: EHV Tower relocation-Punch List Item , Service road unconstructed



Photo 32: Inadequate Maintenance of Carriageway

Project: Environmental & Social Due Diligence of Jadcherla Expressway

Client : SBI Macquarie

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Photo-documentation



Photo 33 : Marble craftsmen within ROW



Photo 34: Consultation with truck drivers inside the carriageway.

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Photo-documentation



Photo 35: Poor median maintenance



Photo 36: Cattle movement inside the carriageway and median

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Photo 37: Cattle Carcass inside the carriageway-unattended



Photo 38: School children crossing the road-inadequate signboards, speed breakers

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Photo-documentation



Photo 39: School Bus plying in the wrong direction



Photo 40: Multi-Axle vehicles parked in non – truck lay bye areas.

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.....Annex B

.....List of Encroachments :- Verified
.....for Jaipur- Mahua road corridor

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
1	176+450	RHS	Jagdamba Stone shop	Permanent	Jagdamba Stone Factory, Dausa	Notice to be issued before drive encroachment	ROW	15	NA	No	Based on field observation there is no permanent construction within the ROW. However, they keep their raw materials in the ROW but are ready to move their material back as and when required. These shops are rented out. Contact could not be made with the real owners so occupation history is not clear, however currently occupied by tenants who have been there for 10-15 years. They informed that the land is not disputed and belongs to the government. Further as they are tenants therefore are not aware of compensation received by the owner. Additionally they are aware of the demolition drive.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
2	176+375	RHS	Stone shop	Permanent	Aarti Cement Udyog, Dausa, 9782637087	Notice to be issued before drive encroachment	ROW	7	NA	No	Based on field observation there is no permanent construction within the ROW. However, they keep their raw materials in the ROW but are ready to move their material back as and when required. Currently occupied by tenants who have been there for 6-7 years. They informed that the land is not disputed and belongs to the government.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
3	176+350 to 175+450	RHS	Only platforms in front of all House/Shops	Permanent	Hotel Atithi front of gate Platform, Joshi Road Lines (9414041662), Saurabh RTI Centre (01427223622), Prop. Digamber Singh Banna Ji (9414035618), Girraj traders, Vijay Transport company Dausa, Govt. Shop Toda Posth, Alwar Road Lines, (9414035101), Bhagwan das Transport Co. (01427-224311), Nirman Bhawan, Punjab Haryana Roadways (01427-224831), Mukesh kumar saini (9983167512), Prabhu Dayal Bairwa Vill-Bhandarej, Radheyshayam Sharma, Shubhi Hospital/Trauma centre, English wine shop, Jaipur Dairy (9414438378) Sanjay Hair Art/Gents Pourlor Shop (9785482846), Tarun honda care, Surendra kumar (9828344850) Aanand Goods Transport company, kasiram sharma (Balaji wale) (9414035585), Anurag kirana store, Ramkishan Santry/Nisha Motor winding, Dayal meena, Gudhaliya Wale, BL Meena (9636434678, 9928552878)	Notice to be issued before drive encroachment	ROW	May-15	No	No	Based on field observation there are no permanent constructions inside the ROW in this stretch. Further, some shops have erected temporary sheds inside the ROW or use this space to store their raw material or have constructed ramps for ease of access. All of the people who were contacted during the field visit on Sep 26-27, 2014 agreed to move back their goods From the field visit it was learnt that most of the shops have been rented out to tenants. The real owners could not be contacted therefore exact occupation history is not clear. There are a few people who also own these shops and they agree that they are not eligible for compensation as the land that they bought was already behind the ROW.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
4	176+450 to 175+000	RHS	Stone factory	Permanent	Mitha Properties, Manesh Kumar (9829285977), Lekhraj sharma(9352667407), Om Shiv murti Bhandar(9829121032), Samay Singh Doi(9460762828), Stone stall, Tin sheet, Balaji Transport company- Aabhaneri wale(9414812304), Krishana Agency, Dausa, (Bhojwada wale), Banwari Lal Mukesh Kumar (9785851634), Pradhan Bhawan & Barasana Hotel, Om Shiv Build Home Pvt. Ltd., Lakhani Singh Rajawat (9887204103 79414388960), Rajawat Bhawan(Prem Pura Wale) 9950797201, Prabhudev Sharma Bhojwada Wale, Rajendra Mohan Sharma, Gayatri Nagar, Dausa, Jeman Trading Company (Dewari Wale) Virender Jeman 9460564068, Ram Kishore Fagana & Kamlesh sharma (9928274226 & 9782643425), Surya Hotel, Hav. Raghuvir Singh (Sumel Wale) Vidhuri Bhawan, Dharam Singh Doi 9Bichalwas Wale) 9636002145, Radha Rani Garden (Rajawada wale), Prabhathi Chaturvedi (Gathora	Notice to be issued before drive encroachment	ROW	May-15	No	No	Based on field observation there are no permanent constructions inside the ROW in this stretch. Further, some shops have erected temporary sheds inside the ROW or use this space to store their raw material or have constructed ramps for ease of access. All of the people who were contacted during the field visit on Sep 26-27, 2014 agreed to move back their goods From the field visit it was learnt that most of the shops have been rented out to tenants. The real owners could not be contacted therefore exact occupation history is not clear. There are a few people who also own these shops and they agree that they are not eligible for compensation as the land that they bought was already behind the ROW.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
5	174+580	RHS	Dilkush tyre shop	Permanent	Dipu	Notice to be issued before drive encroachment	ROW	5	N/A	No	the ROW. The space in the ROW was being used temporary purposes such as for storing tyres and associated products. The owner could not be contacted.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
6	174+400 to 174+175	RHS	Boundary wall ,house ,	Permanent	Rajesh	Notice to be issued before drive encroachment	NA	25	No	No	The owner of the land, Mr Rajesh, confirmed that the boundary of his premises was out of the ROW and therefore the property was not eligible for any compensation. Further, he has not received any notice regarding this issue ever.		Not in ROW	Not eligible for compensation
7	173+800 to 173+700	RHS	House Boundary wall	Permanent	Veer Gurjar, Chawadi Bhawan, 9950027334	Notice to be issued before drive encroachment	NA	20	N/A	N/A	The owner could not be traced but the said boundary was found to be out of ROW		Not in ROW	Not eligible for compensation
8	173+150 to 175+000	RHS	Tin sheet(punjab harayana transport	Permanent	Delhi Hotal (Prempura Wale).9413971182	Notice to be issued before drive encroachment	NA	20	N/A	N/A	The structure has removed and the owner could not be traced		Removed Structure	Removed Structure
9	173+075	RHS	Balaji Stone shop	Permanent	Balaji Stone (khedali Wale)	Notice to be issued before drive encroachment	ROW	6	No	No	It was ascertained during the site visit on Sep 26-27, 2014 that the space within the ROW in front of this shop is being used to store stone articles and/or raw materials. Tenants agreed to move back their goods from the ROW as and when required. The store is being operated by tenants since the last 5-6 years. The owner could not be contacted but the tenants believe that the land was not eligible for any compensation.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
10	171+950 to 171+875	RHS	shop	Permanent		Notice to be issued before drive encroachment	ROW	10	No	No	visit on Sep 26-27, 2014, the shop was not eligible for compensation. Moreover, the shop had only a temporary projection in front of it which was a shed and lied under the ROW. All the permanent structures were outside the ROW. The owner could not be contacted as the site was empty.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
11	171+600	RHS	Tin sheet	Permanent	Ramdhan gurjar Vill.-Padli	Notice to be issued before drive encroachment	ROW	25	No	No	The shop is built outside the ROW. However, the only use of the space within the ROW was used for keeping plastic chairs as the facility is being used as a tea shop/restaurant. Moreover, the owner has covered this sitting area with a temporary roof. As per the talks held with the owner's son during the site visit on Sep 26-27, 2014, their shop is not eligible for any compensation and they will move behind the ROW as and when required.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
12	171+340	RHS	Meat shop ,	Permanent	Kanhaiya lal Bairwa,8003148841	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The structure was found to have been removed on the day of the site visit during Sep 26-27, 2014. The owner could not be traced		Removed Structure	Removed Structure
13	171+370	RHS	Meat shop ,	Permanent	Suresh kumar Vill.-Bhanderej,995052202	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The structure was found to have been removed on the day of the site visit during Sep 26-27, 2014. The owner could not be traced		Removed Structure	Removed Structure
14	170+400	RHS	Boundary wall	Permanent	Kamred Restaurent,Kartar singh ,9772724734	Notice to be issued before drive encroachment	NA	15	N/A	N/A	The facility is not liable for any compensation and was found to have been shifted behind the ROW on the day of the site visit during Sep 26-27, 2014		Removed Structure	Removed Structure
15	169+900	RHS	shop	Permanent	Babulal Vill.-Dhanya ka bandh	Notice to be issued before drive encroachment	NA	15	N/A	N/A	As per anecdotal accounts of the locals taken during the site visit on Sep 26-27, 2014, the shop was not liable for any compensation as it has been outside the ROW. Moreover, the shop has been not visited by the owner for a long time. The owner could not be traced		Not in ROW	Not eligible for compensation
16	169+150 to 169+100	RHS	Water Tank	Permanent	Mangilal saini Vill.-Bijauri	Notice to be issued before drive encroachment	ROW	20	No	No	AS per the dialogue with the owner of the premises the site was not eligible for a compensation. Further, he understands that the structure lies on the ROW and is ready to demolish it as and when required. The water tank was mainly being used for public convenience purposes by truck drivers who stop to eat at the resaurant run by the owner.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
17	163+150	RHS	Hotal water tank	Permanent	Bihari,Neel kamal Hotal(Reta)	Notice to be issued before drive encroachment	ROW	20	No	No	As per the conversation held with the owner's son during the site visit on Sep 26-27, 2014 the land is not liable for any compensation. He understands that the tank lies on the ROW and is ready to demolish it as and when required.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
18	163+025	RHS	2 shops	Permanent	Giriraj Prasad Vill.-Reta	Notice to be issued before drive encroachment	ROW	10	Yes	N/A	As per the anecdotal accounts of locals the owner has claimed the compensation amount and has since discontinued the use of the shops. However, he has not demolished the structure himself but will not protest the authorities demolishing it as and when they require the space. The owner could not been contacted.		Received compensation will remove structure if asked	Received compensation
19	160+650	RHS	House & Shop's	Permanent	Dara singh	Notice to be issued before drive encroachment	ROW	40	Yes	No	AS per the site visit done during Sep 26-27, 2014, the owner was unclear about his compensation amount and has not collected it yet.		Refused to compensation	Pending Compensation
20	159+450	RHS	Stone shop	Permanent	Dhanna lal mahawar	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The structure was found to have been removed on the day of the site visit during Sep 26-27, 2014. The owner could not be traced		Removed Structure	Removed Structure
21	158+600	RHS	Boundary wall	Permanent	Kamlesh kumar meena	Notice to be issued before drive encroachment	ROW	15	Yes	No	Thw owner has received the compensation and is satisfied with it. He agrees to et the encroachment be demolished and to move back behind the ROW		Received compensation will remove structure if asked	Received compensation
22	158+575	RHS	Shop	Permanent	Hardev singh,Nathu singh Vill.-Kelai,9829323427	Notice to be issued before drive encroachment	NA	15	Yes	No	Owner could not be found for comments Sources around did not have enough information about the buildings		Information gap	Information not available
23	158+500	RHS	4 Shop	Permanent	Sanjay kumar Vill.-Kelai,9928254712	Notice to be issued before drive encroachment	ROW	15	Yes	N/A	On the day of the site visit on Sep 26-27, 2014 thw owner could not be traced. However as per the locals the facility has no case pending that the owner was satisfied with the compensation. Consequently he had discontinued the use of his shops.		Received compensation will remove structure if asked	Received compensation

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
24	158+450	RHS	2 shops	Permanent	Hardev doi,Nathu singh Doi,9929323427	Notice to be issued before drive encroachment	ROW	10	N/A	N/A	On the day of the site visit on Sep 26-27, 2014 the owner could not be traced. However the locals were not aware of the details of the compensation for the shops		Information gap	Information not available
25	156+250 to 156+025	RHS	Borwell ,Stone shop,etc.	Permanent	Mohar singh Vill.- Sikandra,9414405818	Notice to be issued before drive encroachment	ROW	10	Yes	No	As per the dialogue with the tenant of the property, the owner had received compensation and was satisfied with the amount. Moreover, they were also ready to move back their temporary storage of stone articles behind the ROW if and when asked. However, they were unsure about the compensation for the borewell present near the site as it belonged to many families who lived around the area. These families could not be contacted.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
26	156+960	RHS	Stone shop	Permanent	Unknown	notice to be issued before drive encroachment	ROW	10	Yes	No	As per the dialogue with the tenant of the property, the owner had received compensation and was satisfied with the amount. Moreover, they were also ready to move back their temporary storage of stone articles behind the ROW if and when asked.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
27	140+550 to 140+500	RHS	School Boundary Wall	Permanent	State Govt. Land, Pilodi	Notice to be issued before drive encroachment	ROW	15	Yes	Yes	The boudry wall is established since 15 years. Compensation is provided .Notice has been served		Govt	Govt Structure
28	140+470 to 140+400	RHS	Panchayat bhavan(Pilodi)	Permanent	State Govt. Land (Govt. Health Centre & Gram Panchayat) Vill. Pilodi	Notice to be issued before drive encroachment	ROW	30		Yes	Out of six structures in the case, 4 are govt infra and two are residential places. Both the house owners have received notices according to the JMPLT personnel as per their information. But in the site visit we found out that these places were sqattered at the moment. The present residencies had no idea if the original ones had received any compensation for these structures or not. The government structures have probably no compliance towards receiving any notice or compensation.		Govt	Govt Structure
29	133+600	RHS	hotel bathroom	Permanent	Bala Ji Pavitra Bhojnalaya Hotel	Notice to be issued before drive encroachment	ROW	10		No	The structure is half broken by the rains Notice for vacation has been received. The owner shall remove it as soon as they receive the compensation The bathroom is established before ten years		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
30	132+830	RHS	Hotel Water Tank	Permanent	Jagdamba Restaurant & Bhojnalya	Notice to be issued before drive encroachment	ROW	20	no	yes	The residencies are the tenants and the land belongs to the daadli wale. The housing structure are existing since last 20 years. The people have not received any notice to vacate yet. Not even a verbal instruction has been given to them to vacate the place. The owner's of the hotel and the land are not eligible for it's compensation since the tank occupies government land which makes the hotel owner a sqatter on the land.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
31	131+200 to 130+200	RHS	Patoli Town	Permanent	Platform in fornt of House	Notice to be issued before drive encroachment	Service Lane	30		yes	A lane of housing structures is established exactly besides the service lane. Some have built their water tanks on the platform of the service lane and some have their front doors crossing the platform. Notices have been given to them. Compensation too has been received. But as they say, they will vacate it next time when they will be asked to since they are using it presently.		Received compensation will remove structure if asked	Received compensation

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32	129+925	RHS	Hotal water tank	Permanent	Unknown	Notice to be issued before drive encroachment	Service Lane	15	Yes	Yes	This is a case of encroachment. Notice has been given. Compensation is paid as well. The owner hasn't removed the water tank but he will if again asked to by the authorities		Received compensation will remove structure if asked	Received compensation
33	126+950 to 126+900	RHS	Platforms of houses	Permanent	Ramkishan Gurjar	Notice to be issued before drive encroachment	ROW	9	No	No	Housing structures built by the service lane away from it. But 8 temporary houses are on the platform.No notice has been served to them. No compensation has been and will not be given since they are on the government land.		Oppportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
34	126+600 to 125+600	RHS	Pipalkheda Town	Permanent	Platform in fornt of Houses	Notice to be issued before drive encroachment	Service Lane	14		no	Housing structures built by the service lane are away from the lane. Except for 8 temporary houses that are on the platform. No notice has been served yet. But verbal instructions has been given. Since they are on govt land and not eligible for any compensation they have agreed to vacate the places as soon as possible.		Oppportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
35	123+450	RHS	Hotal water tank,parapet wall	Permanent	Bajrang Hotel	Notice to be issued before drive encroachment	Service Lane	10		no	The land belongs to the village (i.e. Abaadi land). There are houses built besides the service lane. Only in one case a parapet wall is passing the platform of the service lane for which notice has been given to the owner. Presently the owner is waiting for the compensation to remove the structure.		Compensation is yet to be given	Compensation is pending
36	123+250	RHS	Bathroom,(vishal hotel)	Permanent	Vishal Hotel	Notice to be issued before drive encroachment	ROW	6		no	Notice has been given. Removal of the structure id awaited till the compensation is received by its owner. The owner is satisfied with the amount of compensation being offered.		Received compensation will remove structure if asked	Received compensation
37	122+525 to 122+475	RHS	Boundary wall,tin shad bathroom	Permanent	Tata Motors,9414031471	Notice to be issued before drive encroachment	ROW	7		no	The tin shed has been removed after receiving notice and the compensation. That counts for one of the two parts of the case. The boudry wall is an still existing. Notice was already given to the owners. But the owner of the wall has not received compensation yet thus the removal of the structure is awaited. The owner is ready to remove the structure once he recieves the compensation.		Compensation is yet to be given	Compensation is pending
38	122+000 to 122+050	RHS	Tyre puncture shop	Permanent	Sher Punjab Khalsa (Punjabi)	Notice to be issued before drive encroachment	ROW	3	yes	yes	The owner was given the notice to remove his tyre puncture garage. Soon after which he received his compensation and he moved away with the shop.		Removed Structure	Removed Structure

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39	120+950 to 120+100	RHS	Jhopadi, bathroom	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	5	no	yes	Both the huts and the bathroom are existing on the land. They are eligible for compensation. They had received notices for both the structures. The owner is compensated for both the structures but still it hasn't been removed since the land is not yet compensated. They have filed an application in the collector office demanding for the compensation of the land.		Not compensated for land	Compensation is pending
40	120+100 to 120+960	LHS	Samlethi Town	Permanent		Notice to be issued before drive encroachment	ROW	70		no	Notices were given to all to vacate the places. Compensation prepared and accepted by 1 out of 20 cases. The reason of refusal - (a) compensation was paid only for the land and not for both the land and the structure. (b) compensation for the land has been paid under 'agri' title. The land is 'commercial' as per the owners. 20 of the owners have filed cases in the district court, asking for compensation of the land under 'commercial' title and also for the structure of the house that was on the land.		Court cases	court cases
41	121+850	LHS	Boundary wall, temple	Permanent	Padli Balaji Aashram	Notice to be issued before drive encroachment	ROW	19	yes	no	The owner has occupied the land since 19 years now. Compensation for the land as well as the boundary wall was received by the owner in 2011. No written notice to vacate it was given but the owners were instructed verbally. Every Thursday a fare is arranged at the temple. The owner is ready to remove the wall on any coming day. He kept it existing since there was no pressure on him to remove it by the authorities.		Received compensation will remove structure if asked	Received compensation
42	122+650	LHS	Boundary WALL, GUARD Room	Permanent	Hotel Gangaur	Notice to be issued before drive encroachment	ROW	7	NA	NA	The structure is abandoned as of now. No sign of owner and no one else could give any information.		Abandoned	Not eligible for compensation
43	123+650 to 123+760	LHS	house shed	Permanent	Mr. Kirti Nangal	Notice to be issued before drive encroachment	ROW	5	Yes	yes	The structure is owned since 2009. The notices have been served and the compensation is received too. The owner is ready to remove at any given point.		Received compensation will remove structure if asked	Received compensation
44	124+140 to 124+260	LHS	School Boundary Bhojpur	Permanent	State Govt. Land	Notice to be issued before drive encroachment	ROW		NA	NA	The school was found un-operational after the site visits to the school and through interactions with the local people. No further information could be gathered hence.		Govt	Govt Structure
45	124+425 to 124+560		Mojpur Town	Permanent	Platform in front of House	Notice to be issued before drive encroachment	ROW	45	no	yes	There were temporary structures on the platform of the service lane and the occupants were scattered since the land belonged to the government. By verbal instructions only the land was cleared.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
46	125+400	LHS	Guard room	Permanent	Rajputana Midway	Notice to be issued before drive encroachment	ROW	4	no	no	The hotel and the property was bought by the current owner just before 4 years from now. He admitted that he had not received any notice or compensation but he had no clue if the previous owners did. He did not need the guard room anymore or even the compensation amount. He has no issues with the guard room being removed from the place.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
47	125+700 to 126+600	LHS	Pipal khera Town	Permanent	Platform in front of House	Notice to be issued before drive encroachment	Service Lane	4	yes	yes	removed		Removed Structure	Removed Structure
48	126+900 to 126+950	LHS	Hotel Boundary wall & Shop	Permanent	Hotel Manpasand	Notice to be issued before drive encroachment	NA	7	yes	yes	removed		Removed Structure	Removed Structure
49	127+870 to 128+100	LHS	Boundary wall, hotel room	Permanent	Hotel Gurukripa	Notice to be issued before drive encroachment	ROW	35	NA	NA	After visits to the site no hotel boundary wall was seen or even the signs of its removal were observed. Thus there is no information regarding the structure.		Removed Structure	Removed Structure
50	130+150 to 130+250	LHS	Patoli Town	Permanent	Platform in front of House	Notice to be issued before drive encroachment	Service Lane	10	no	yes	The occupants were living as squatters on the land and hence were given notices to vacate the place. They are not supposed to be compensated for the removal. The people have not yet made the place empty but they do always agree to vacate the place as per the JMTPL personnel.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

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51	130+550 to 131+200	LHS	Shops & front platform	Permanent	Unknown	Notice to be issued before drive encroachment	Service Lane	3		NA	After visits to the site no such structure was seen or even the signs of it's removal were observed. Thus there is no information regarding the structure.		Removed Structure	Removed Structure
52	133+350 to 133+550	LHS	Tin shade,bathroom,boundary wall & Tyre Puncture	Permanent	Banaji Prince Bhojnalya,Tyre Service (96940578010 & Shri Ram Pavitra Bhojnalaya	Notice to be issued before drive encroachment	ROW	7		NA	After visits to the site no such structures were seen or even the signs of it's removal were observed. Thus there is no information regarding the structure.		Removed Structure	Removed Structure
53	133+550 to 134+150	LHS	Market(shops)	Permanent	Meena Tea Stall Mr. Kamlesh Meena, Payal Pavitra bhojnalaya (9694613228), Sagar Pavitra Bhojnalaya, Bhomia Kirana store, Kalapna Travel Agency(9414280573), Amar pavitra Bhojnalaya (9413947582), Gupta Aachar Murbba Udyog(Bhusawar wale), Kalyan Saras Pourlor, (9828264514), Ashoka Pavitra Bhojnalaya, Bala Ji Cold drinks, Shiv Krishi Yantra, Joharwal auto Parts(9414519085), Mamata Auto parts (9461251746), Krishan Tea Stall, Aatil Auto Parts, Jharwal tent house Mr. Rakesh (9414362710), Ganesh DJ Sound (9928141085), Lala ram meena, shiv Charan Meena(9950094298), Shayam lal mistri(9828418425), Srhi Ramnarian Work shop.	Notice to be issued before drive encroachment	Service Lane	6	no	yes	Since the shop keepers has established their temporary structures on the government land they were squatters on the land. They were given notices to vacate the place and now they are no more the the same land. The land is clear.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
54	135+400	LHS	Temple	Permanent	Langra wale Bala Ji	Notice to be issued before drive encroachment	ROW	4	no	yes	owner has 5 biga land in total in the area. His intersted in saving the small part of the structure which is the main temple area. He has occupied the place since 4 years now. He also narrated an exmple of one officer who had come to vacate the land form the temple structure but did not do so and went away saying that this god's place cannot be brought down. The status of the structure and the land still remains the same after the notices were served.		Information gap	Information not available
55	135+700 to 135+800	LHS	woods tall,stone shop	Permanent	Kalayan MeenaVillage- Gurjar Shimala	Notice to be issued before drive encroachment	Service Lane	1	no	yes	There is a temporary arrangment of a wood stall and stone shop on the platform of th service lane. A the JMPLT personnel as well as the locals we foud that the shop keepers repeatedly put up the material for sale on the platform of the service road after being warned. They have been given notices and they are not eligible for compensation since they are sqqatter on the land. Though they keep moving back from the land from time to time, they come back after some days.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
56	137+720 to 137+775	LHS	Boundary wall,Dust feeling	Permanent	Village - Khera Paharpur	Notice to be issued before drive encroachment	Service Lane	1	no	yes	temporary arrangment of a wood stall and stone shop b. the shop keeper repeatetively puts up the material for sale on the platform of the service road after being warned and removed out of the way.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
57	139+350	LHS	Temple Hanuman Ji	Permanent	Village - Thikaria	Notice to be issued before drive encroachment	ROW	25	NA	NA	After visits to the site The owner was not found. Even the locals had no information regarding the same. Thus there is no information regarding the structure.		Information gap	Information not available
58	140+525	LHS	water tank	Permanent	Shree Chand meena Vill.-Pilodi	Notice to be issued before drive encroachment	Service Lane	13	NA	NA	After many visits to the site The owner was not found. Even the locals had no information regarding the same. Thus there is no information regarding the structure.		Information gap	Information not available
59	140+700	LHS	Balaji mandir,water tank	Temporary	Village - Pilodi	Notice to be issued before drive encroachment	Service Lane	16	NA	NA	After visits to the site The owner was not found. Even the locals had no information regarding the same. Thus there is no information regarding the structure.		Information gap	Information not available

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60	141+025	LHS	Pandit dhaba & water tank	Permanent	Pandit dhaba & water tank	Notice to be issued before drive encroachment	Service Lane	10	yes	yes	The owner of both the dhaba and the tank was given notice for vacating the land and he did clear the area where he received his compensation.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
61	141+250	LHS	Shri Laxmi Restaurant	Permanent	Shri Laxmi Restaurant	Notice to be issued before drive encroachment	ROW	6	no	no	The workers have no idea about the notice or the compensation for the removal of the restaurant from the place. When they got in touch with the owner, he admitted that he was verbally instructed to vacate the land but since no such notice came, he did not take any action on the same.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
62	141+325	LHS	New dust feeling, stone shops, etc.	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	3	yes	yes	removed		Removed Structure	Removed Structure
63	141+650	LHS	RK Stone	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	1	yes	yes	removed		Removed Structure	Removed Structure
64	156+900	LHS	Tea stall	Temporary	Unknown	Notice to be issued before drive encroachment	ROW	15	Yes	No	As per the dialogue with owner of the property, they had received the compensation and were satisfied with the amount. Although they currently squatting the ROW with a temporary shed, but are ready to evict as and when required. They agree to have heard the announcement regarding vacating the ROW through loudspeakers being carried out by JMTPL.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
65	157+625	LHS	House	Permanent	Mr. Jai Narayan, Beraiva Mollaha, Sikandra, Dausa, Raj	Notice to be issued before drive encroachment	ROW	30	Yes	No	As per the dialogue with the owner they have received the compensation amount and are satisfied with it. They agree to let the authorities demolish their establishments. However, they claim they were not compensated for the borewell that lies along their house. The owner has been present at the site for around 45 years.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
66	159+590	LHS	Dharamshala	Permanent	Panchayat land	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	No encroachment visible during the site visit carried out on Sep 26-27, 2014. Since no one was present on or around the site, exact ownership details could be found out		Removed Structure	Removed Structure
67	165+240	LHS	Boundary wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	20	Yes	No	The owner has been compensated and satisfied. The encroachment is a hedge which is of temporary nature and has been erected to keep the grazing animals out of his premises. He agrees to take the hedge down and move back behind the ROW as and when required		Received compensation will remove structure if asked	Received compensation
68	165+500	LHS	Boundary wall	Permanent	Unknown	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The structure was found to have been removed on the day of the site visit during Sep 26-27, 2014. The owner could not be traced		Removed Structure	Removed Structure
69	165+825	LHS	House	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	20	NO	NO	The owner has not yet been compensated. Information whether eligible for compensation could not be ascertained as the land was reported to belong to the Kaloko village panchayat. The land was offered to the temple priest for his family's quarters and this family has been living there for around 10 years		Compensation is yet to be given	Compensation is pending
70	166+225	LHS	Hotel Ummed Lake Gate	Permanent	Ummed Hotel	Notice to be issued before drive encroachment	ROW	10	No	No	No detailed information could be received. It was reported by locals that the structure is only a cosmetic structure and is not eligible for compensation.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
71	166+700	LHS	shops	Permanent	Unknown	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The said shops were found to have been removed on the day of the site visit on Sep 26-27, 2014		Removed Structure	Removed Structure
72	169+000	LHS	House	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	40	Yes	No	The owner had been compensated and was satisfied with it. He had himself demolished the property to a certain extent and was ready to let authorities take over the land although he was still using the ROW land for farming.		Received compensation will remove structure if asked	Received compensation

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73	172+800	LHS	House & Old Borewell	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	40	Yes	No	Owner has not collected the compensation although is satisfied with the amount. The borewell has not been compensated for as it belongs to the Kherwi village panchayat		Refused to compensation	Pending Compensation
74	179+600	LHS	House (Water Tanky)	Permanent	Unknown	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	The tank could not be located around the site but it seemed out of the ROW on the day of the site visit on Sep 26-27, 2014		Removed Structure	Removed Structure
75	180+450	LHS	Boundary Wall	Permanent	Devishay Manpuriya	Notice to be issued before drive encroachment	ROW	10	No	No	Owner has been there for 10-15 years and believes there was no need for compensation. They agree to abandon the borewell as nd when required		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
76	180+500	LHS	House, Boundary Wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	15	No	No	The owner claims they are not eligible for any compensation and has agreed to bring his temporary hedge behind the ROW		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
77	182+725	LHS	House, Boundary wall	Permanent	Balaji Diesels	Notice to be issued before drive encroachment	ROW	15	N/A	No	As per one of the staff tworking at the shop, he owner was not compensated as he was not eligible for it. Owner could not be contacted.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
78	182+800to183+300	LHS	Dausa Bypass	Permanent	Temporary moveable encroachments both side.	Notice to be issued before drive encroachment	ROW	2	no	yes	The owners are ready to vacate the land as soon as they receive their compensation. They had received a notice of it and they are aware that the land doesnot belong to them.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
79	183+350	LHS	Hotal Tin Shade, Platform	Permanent	Kamal kumar Vill.-Lalsot	Notice to be issued before drive encroachment	ROW	5	no	yes	The owner has received notice to vacate the land and also he has agreed to do so once he receives his compensation. He is not satisfied with the amount of compensation but he is going to accept it.		Refused to compensation	Pending Compensation
80	184+300 to 184+400	LHS	Lalsot Bypass	Permanent	Temporary moveable encroachments both side.	Notice to be issued before drive encroachment	ROW	2	no	yes	The owners are ready to vacate the land as soon as they receive their compensation. They had received a notice of it and they are aware that the land doesnot belong to them.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
81	184+850	LHS	Boundary Wall Farm House	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	9	yes	yes	The owner had received the notice and also got compensated so according to him and also the locals he has cleared the land back in 2002 itself.		Removed Structure	Removed Structure
82	185+325	LHS	Shop & House	Permanent	NO	Removed	ROW	50	no	yes	The owner is entitled to get compensated for both the structures and the land. But he claims his ownership over the land and is not ready to give it up. The issue is that even the government claims ownership on the same land. That is why there has been brought a stay over the process of vacation of the land.		court cases	court cases
83	188+150	LHS	Shiv Temple Wall	Permanent	Temple	Notice to be issued before drive encroachment	ROW	60	no	yes	The temple is situated on plot no 102. The land first belonged to the resident. But later it was taken for govt purpose. The owners are eligible for compensation but they are not satisfied with the amount of compensation that is offered to them. Thus they have refused it and now have applied for fair compensation i.e. 1 crore, in collector's court.		court cases	court cases
84	188+300	LHS	House	Permanent	Krishanawtar sharma Vill.-Bhandana	Notice to be issued before drive encroachment	ROW	25	no	yes	The structure occupies plot no 110. The owners have recieved a notice to vacate the same. But they are not happy with the amount that is offered. They have filed an application for fair compensation for both the house and the land. They are ready to vacate it when they will get their due share according to them.		court cases	court cases
85	188+550	LHS	Boundary wall	Permanent	Ramesh,Mohan lal Vill.-Bhandana	Notice to be issued before drive encroachment	ROW	8	NA	NA	The structure was found completely abandoned after two visits to the plot. Thus no more information could be gathered about it.		Abandoned	Not eligible for compensation
86	188+725	LHS	Boundary wall	Permanent	Khusal,Sarwan lal Vill.-Bhandana	Notice to be issued before drive encroachment	ROW	4	no	no	The land belongs to the village since 1962 (i.e.Abadi land). The occupants never recieved any notice or compensation for the property. They are residing in the same structure for last 40 years now.		Information gap	Information not available

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87	188+825	LHS	School Boundary wall	Permanent	State Govt. land	Notice to be issued before drive encroachment	ROW	25	NA	NA	The wall is an existing structure. The school was found non-operational after visiting the site and interacting with the locals about it. Since this is a govt owned building, there is no liability of it towards compensation. Also there was no one available to give information on the same.		Govt	Govt Structure
88	188+970to189+050	LHS	Sh.Rajesh Pilot Boundary wall	Permanent		Notice to be issued before drive encroachment	ROW	46	no	yes	This particular area is plot no. 1175. The owners were offered compensation of 31 lakh for the structure and 80,000 for the land which they refused as they found it less. They have now applied to the SDM for fair compensation.		Court cases	court cases
89	189+175	LHS	Wine Shop	Permanent	Chet Ram Vill.-Bhandana	Notice to be issued before drive encroachment	ROW	10	no	yes	The wine shop exists in the area since a long period. And some part of it crosses the RoW for which they were given notices. But there was no change in the status after that from the owner's side since he was not compensated for the land but only for the structure. He has applied to the collector's office for fair compensation and agrees to move back from the area only when he is paid completely and fairly.		Court cases	court cases
90	189+200	LHS	Shiv Temple wall	Permanent	Temple	Notice to be issued before drive encroachment	ROW	40	no	yes	the temple exists in the area for about 20 years now. The owners was offered a compensation of rupees 3 and a half lakhs in 2007-08. But they were never given a written notice for it. Because the owner needs to be compensated for both the land and the structure and now he is offered amount only for the structure, he has filed an application for fair compensation and is waiting to shift his temple for the same reason.		Court cases	court cases
91	189+600to189+700	LHS	Houses	Permanent	Sita ram ,Ramkishan Vill.-Bhandana	Notice to be issued before drive encroachment	ROW	50	no	no	People exchanged of land for land according to own convenience which was given to them by the government. Compensation received only for the structure. No notice was served. People have occupied the area since last 50 years A court case is ongoing at SDM Dausa for compensation of land too.		court cases	court cases
92	193+075	LHS	Jai Mata Di Pavitra Bhojnalya	Permanent	Kailash chand saini Vill.-Maruti colony Dausa	Notice to be issued before drive encroachment	ROW	12	yes	yes	Both notices and compensation received. The land is clear.		Removed Structure	Removed Structure
93	194+650to194+700	LHS	House, Boundary wall, Shop	Permanent	Gopi lal, Jagdish jat Vill.-Gothara	Notice to be issued before drive encroachment	ROW	22	no	yes	The place is occupied since 22 years. notice was last served in 2007 and the compensation that was offered was refused by the owner since it was so less. Now case ongoing in the high court for fair compensation for commercial land.		court cases	court cases
94	194+770	LHS	Shop	Permanent	Paramanent	Notice to be issued before drive encroachment	ROW	20	no	no	Compensation received for only the land under agri title but the land comes under commercial title. Court case for fair compensation is ongoing. Plot no 715.1098 approx. Partial compensation for the agri land is given. No notice was being served		court cases	court cases
95	195+720to195+800	LHS	Pach Mukhi Hanuman Ji Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	10	NA	NA	The existing structure is there where it is since last 10 years. After visit to the site the owner could not be found thus no more information on the same is available.		Information gap	Information not available
96	196+200	LHS	Old Borewell	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	80	NA	NA	The place could not be found nor any signs of its removal were seen after visits to the site. The locals show no memory of such structure being present.		Removed Structure	Removed Structure
97	197+100to197+225	LHS	Boundary wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	10	NA	NA	There was no owner or caretaker available or found in few visits to the site. The locals say that the wall is abandoned for a long time now. There was no more information available on the structure.		Abandoned	Not eligible for compensation
98	197+400	LHS	Hotal Water Tank	Permanent	Ashok ,Hanuman tanwar Vill.-Jhar	Notice to be issued before drive encroachment	ROW	6	no	no	a. notice was received 12 days back b. will not be compensated since the land is of govt and is encroached at this moment. C. the owner has bought the land and the property 6 months back d. has not observed any demolition nearby and is ready to remove structure		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
99	200+900	LHS	Tejaji Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	15	NA	yes	The local people say that the temple exists 15 years back from now and there is no owner to it or even if there is they don't know anyone as such. There was a notice served to the temple once as per an old man in the area but it was never removed. Noone knows about compensation of the structure.		Information gap	Information not available
100	201+100	LHS	Hotal Radhika Tin Shade	Permanent	Ramjilal Vill.-Jhar	Removed	ROW	7	no	no	The owner was not eligible for the compensation since the shed was coming over the RoW and that area belongs to the government. By verbal notice by the roadway authority, the shed was asked to remove and it was. The land is clear.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
101	201+650	LHS	House Boundary wall	Permanent	Arjun Lal,Kailash meena Vill.-Jhar	Notice to be issued before drive encroachment	ROW	21	no	yes	The owner was compensated and had received notice for the land in 1975 by the govt for acquisition. They are residing at the place since generations but the boundary wall was made just 7 years back. They have not observed any demolition at nearby places. The owner will not be compensated for the boundary wall since he is an encroacher on it at present though he owned the land years back, but now it belongs to the govt and he is already being paid the compensation for that land.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
102	201+800	LHS	House Boundary wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	18	NA	NA	after talking to the people around what came out was that the wall existed for around 18 years as of now. But since it was abandoned for a long while now, there was no one to give information on the same.		Abandoned	Not eligible for compensation
103	201+980to200+000	LHS	House	Permanent	Ramlal,Poonam meena Vill.-Jhar	Notice to be issued before drive encroachment	ROW	25	no	yes	the owner was not compensated and had received notice for the land in 1975 by the govt for acquisition. The owners are residing at the place since generations. They have not observed any demolition at nearby places. The owner will not be compensated for the boundary wall since he is an encroacher on it at present.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
104	200+000	LHS	House	semi Permanent	Rewar mal jangid Vill.-Jhar	Notice to be issued before drive encroachment	ROW				Information gap		Information gap	Information not available
105	202+300	LHS	One Room & School Boundary wall	Permanent	State Govt. Land	Notice to be issued before drive encroachment	ROW	30	N/A	N/A	On the day of the site visit on Sep 26-27, 2014 the room was found to be abandoned and locals were not available nearby for comment. School authority could not be contacted		Govt	Govt Structure
106	202+360to202+400	LHS	Shop & Boundary wall	Permanent	Daulat ram,Panchu ram meena Vill.-Jhar Ramshey Meena	Notice to be issued before drive encroachment	ROW	30	Yes	No	As per the neighbours Mr Daulat Ram was involved in a case for unfair compensation for his house in the Jaipur high court. The disputed area is approx. 5X3 m. Mr Ramshay Meena, who is the nearest neighbour of Mr Daulat Ram and owns the shops of total approx dimensions of 3X25m, has recently accepted the compensation and agreed to let his shops being demolished by the authorities as and when required. All the owners have been for around 20-25 years. During the site visit none of the above two could be contacted but the son of Mr Ramshay Meena was available to provide this information.		court cases	court cases
107	203+740	LHS	Dharm Kanta	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	N/A	N/A	N/A	As per one of the JMTPL highway patrolling staff, the owner has accepted to stop operating in the ROW and has since abandoned the use of this facility. On the day of the site visit, Sep 26-27, 2014, no accounts could be obtained as neither the owner could be located nor were there any locals around who could provide any information.		Information gap	Information not available
108	204+130	LHS	Shop Tin Shade	Permanent	Parbhathi Lal Vill.-Jhar	Notice to be issued before drive encroachment	NA	15	Yes	No	On the day of the site visit the owner was found to have complied with the ROW restrictions and has removed his sheds from inside the ROW		Removed Structure	Removed Structure

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109	205+460	LHS	House & Old Borewell	Permanent	Radheshyam Vill.-Doodhali	Notice to be issued before drive encroachment	ROW	35	no	yes	The house and the well is an old structure of the area. The land also belonged to these occupants first before it was acquired by the govt. But at that time they were given both the notice and the compensation. But the owners were not satisfied with the compensation offered to them since they filed a case for fairness of compensation directly in the Rajasthan high court. The case is an ongoing matter as of now.		court cases	court cases
110	206+800	LHS	Boundary wall & Room	Permanent	Gopal Chhipi	Notice to be issued before drive encroachment	ROW	20	no	yes	The owners were served notices to vacate the land as well as they were offered compensation for it. But since they were not satisfied with the compensation offered to them they filed a case for fairness of compensation directly. The case is an ongoing matter as of now.		court cases	court cases
111	207+000	LHS	Platform	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	5	yes	yes	The owners were given rupees 9 lakh and 20,000 for the platform after notifying them to clear the area. They have agreed to vacate the land as and when the next verbal call for it by the authorities come in.		Received compensation will remove structure if asked	Received compensation
112	207+300	LHS	House	semi Permanent	Unknown	Notice to be issued before drive encroachment	ROW	50	no	yes	The land belonged to the panchayat before it was given to its present owners. The owners now are served notices for its clearance and they are ready to do it as and when they receive their compensation instead of the land.		compensation is yet to be given	Compensation is pending
113	208+400	LHS	Hotel & Shop	Permanent	Giriraj sharma Vill.-Bassi	Notice to be issued before drive encroachment	ROW	4	no	yes	This case includes 9 shops and hotels together in the stretch of a few kms. One of the shops has only the parapet wall crossing the RoW. Other 8 shops are moved back from the RoW when they were given the first verbal instruction itself. They had some temporary sheds in front of their shops passing the line. The owner of the 1st shop agrees to take his parapet away as soon as possible. None of them are eligible		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
114	208+480	LHS	Hotel & Shop	Permanent	Ramkishor sharma Vill.Bassi	Notice to be issued before drive encroachment	ROW				Information gap		Information gap	Information not available
115	209+140	LHS	House	Temporary	Unknown	Notice to be issued before drive encroachment	ROW	20	yes	no	The house owners were sent notices to vacate the place long back and they had vacated the place without removing it. Thus the structure still exists but there is no formality remaining other than breaking it down.		Abandoned	Not eligible for compensation
116	209+300	LHS	Animal Husbandary Training School	Permanent	Govt. land	Notice to be issued before drive encroachment	ROW	20	no	yes	The structure is on the government land and the owner has been sent a notice to vacate it but since he is not satisfied with the amount of compensation, he has filed a court case asking for fair compensation. The removal of the structure is awaited for the same.	Punch Listed	court cases	court cases
117	209+450 to 210+000	LHS	Bassi Chak Town	Permanent	Temporary moveable encroachments both side.	Notice to be issued before drive encroachment	ROW	1	no	no	Temporary projections of the houses are now removed. They were not eligible for the compensation as they were scattered.		Removed Structure	Removed Structure
118	F	LHS	Tea Shop & Boundary Wall	Permanent	Omprikash sharma Vill.-Bassi(RICO)	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
119	211+170	LHS	Shop	Permanent	Unknown	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
120	211+570	LHS	Tea Shop	Permanent	Radhamohan sharma	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure

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121	212+020	LHS	House	Permanent	Unknown	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
122	212+100	LHS	Tin Shade	Permanent	Unknown	Removed	ROW	Na	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
123	212+680	LHS	Water Tank & Old Borewell	Permanent	Unknown	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
124	213+520	LHS	Old Borewell & Temple Boundary Wall	Permanent	Matadin Soni Vill.-Jaipur	Removed	ROW				The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
125	213+900	LHS	Boundary wall	Permanent	Unknown	Removed	ROW	NA	NA	NA	The structure was not visible anywhere on or near the site. It is removed from the place long back as per the JMPTL records.		Removed Structure	Removed Structure
126	214+050	LHS	Sai Baba Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	15	yes	yes	There is a cluster of 5 shops in the series of kms. Out of which 4 have received compensation. All waiting to move after the remaining one shop receives its compensation amount.		compensation is yet to be given	Compensation is pending
127	214+750	LHS	House	Permanent	Ramshay sharma Vill.-Mangarh Khokhawala	Notice to be issued before drive encroachment	ROW	10	no	no	The occupant of the structure was never the owner of the land. Rather he was a squatter on the structure as well as the land. The person has been given notice to vacate the place and is not eligible for any compensation. But since there is no other alternative for him at present he is waiting to vacate the place.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
128	215+850	LHS	Water Tank	Permanent	Unknown	Removed	ROW	8	no	yes	The water tank is on the govt land and needs to be removed for which it was given a notice as well as offered a compensation. But the compensation never reached the owner because of which the owner has not removed the structure from the place. He agrees to move back once receives the compensation due.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
129	216+180	LHS	Hotel Water Tank	Permanent	Hansraj sharma	Removed	ROW	22	no	yes	The water tank is illegal on the land since he has given away his land to the government and has received compensation against it. He was given no notice to clear the land. Nor is he eligible for or interested in the compensation. He believes that the water tank is there to provide water to the side passangers. But the govt could remove it whenever it wants.		Opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
130	216+660	LHS	Boundary wall	Permanent	Unknown	Removed	ROW	14	NA	NA	removed		Removed Structure	Removed Structure
131	217+000	LHS	Shop	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	7	no	yes	The shopkeeper is ready to give away the land after he receives his due compensation amount.		compensation is yet to be given	Compensation is pending
132	217+100	LHS	Shiv Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	40	no	yes	ongoing court case for fair compensation in the civil court. Case number 60 haven't demanded compensation for land but only for the structure. The amount challenged in the court is 80,000 rupees for the temple.		court cases	court cases
133	217+450	LHS	House Platform	semi Permanent	Unknown	Removed	ROW	NA	NA	NA	Removed in 2008 february.		Removed Structure	Removed Structure
134	218+000	LHS	Boundary wall	semi Permanent	Forest Department	Notice to be issued before drive encroachment	ROW	30	no	NA	The boundary wall was government's property since there was no notice or compensation involved. But it was removed in one of the encroachment drives that took place in last 6 years as per the local people say. Whether the forest department had received a notice for vacation of this area is not clear. But the land now is free for the govt use.		Govt	Govt Structure

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135	218+200	LHS	Tin Shade	semi Permanent	Ramlal,Pappu ram sharma Vill.-Sahid ki pukliya	Notice to be issued before drive encroachment	ROW	20	yes	yes	The hotel is situated at the curve of the highway. It is built in one horizontal line which makes some diagonal part of the hotel cross the RoW, where there is a tin shed spread above the dining space. The hotel owner was given the notice and he has also received a compensation against it. He is satisfied with the amount of the compensation too. But since there was no pressure to remove it within no time, he is still utilising it. He agrees to move back as soon as possible.		Received compensation will remove structure if asked	Received compensation
136	218+920	LHS	Boundary wall	semi Permanent	Unknown	Notice to be issued before drive encroachment	ROW	8	yes	yes	The boundary wall was removed as it was abandoned for years and proved of no use to its owner. Thus he received a compensation amount for it when he received a notice to remove it. He cleared the land when he was asked to.		Received compensation will remove structure if asked	Received compensation
137	219+300	LHS	Old Borewell & Room	semi Permanent	Unknown	Notice to be issued before drive encroachment	ROW	17	NA	yes	The neighbouring people say that the owner of this structure had received a notice to vacate the land. But they could not tell if he had received the compensation for it or not. But the structure is now abandoned from a long while. Thus more information cannot be produced.		Abandoned	Not eligible for compensation
138	219+500 to 221+000	LHS	Kanota Town	semi Permanent	Temporary moveable encroachments both side.	Notice to be issued before drive encroachment	Service Lane	7	no	yes	Person present at the place Mr avinash khandelwal with whom we interacted, who is an owner of one of the 18 shops covered under this one case. The rajput brothers had bought the shops without any registry but only agreements. Thus they were never the legal owners of the property. Thus they were given notices to clear the land but were not eligible for any compensation. In the encroachment drive in 2009 all such structures under the so-called ownership of these rajput brothers were removed. Since the original owner never demanded for any compensation, it was not given to anyone. The land is clear.		Removed Structure	Removed Structure
139	221+800 to 223+000	LHS	Village-Bagarana	Permanent		Notice to be issued before drive encroachment	ROW	25	no	yes	There are approx 30-50 households facing the same issue as recorded in this case. The land did not always belong to the present occupants. It was given to them on lease by the government. Sometime back (around 15 years) the same land was then acquired by JDA but remained undisturbed. This was the time when the earlier residences had moved away. But few years back they moved back to their earlier places. Technically, this makes these people squatters. These people thus are not eligible to the compensation because they aren't the owners. But they have received notices to vacate the places as soon as possible. Most of the structures in this area are permanent and then semi permanent.	Punch Listed	unclear title	Pending Compensation
140	223+000to224	LHS	Village-Purani Chungi Town	Permanent	Temporary moveable encroachments both side.	Removed	ROW	NA	yes	yes	The structures were not found anywhere on the site because they were removed long ago before the visit was made. Though the removed ones can be categorised into the residential infrastructures e.g. extended front yards, boundaries, small portions of houses etc. These people were given notices as well as paid compensation for the land acquired. The land is now clear.		Removed Structure	Removed Structure
141	224+000to225+000		Village-Palri Meena Town	Temporary	Temporary moveable encroachments both side.	Removed	ROW				removed		Removed Structure	Removed Structure
142	225+000to226+100	LHS	Village-Rajesh Coach	Permanent	Temporary moveable encroachments both side.	Removed	ROW				removed	Punch Listed	Removed Structure	Removed Structure
143	226+120to227+000	LHS	Village-Prem Nagar	Permanent	Temporary moveable encroachments both side.	Removed	ROW				as per the manager of the hotel the land belongs to the owner and not to the govt		Removed Structure	Removed Structure
144	228+400	LHS	Boundary wall	semi Permanent	Hotel Chanda Garden	Notice to be issued before drive encroachment	ROW						opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
145	228+700	LHS	Boundary wall	Permanent	Hotel Chandra Mahal	Notice to be issued before drive encroachment	ROW						opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

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146	228+850	LHS	Boundary wall	semi Permanent	RSEB office (AEN)	Permanent	ROW				Govt		Govt	Govt Structure
147	228+900	RHS	Darghah	Permanent	Mazar	Notice to be issued before drive encroachment	ROW	30	N/A	N/A	Caretaker says he has heard loudspeakers warning of demolition but believes he ought to take no action. Claims he hasn't been approached by any authorities, except for two years ago when he was asked to lower the height of the outer wall of the dargah. Covered area is approx. 25X3 m Owner belong to village Khamiya Banda Name:Hamid Muniyas Caretaker name: Sharif Has been there for 25-30 years at least as per anecdotal accounts.	Punch Listed	Information gap	Information not available
148	227+000to226+000	RHS	Village-Prem Nagar	semi Permanent	Temporary moveable encroachments both side.	Removed	ROW	15	No	NO	Most of the dwellings in this track believed to be encroachments were temporary shed works or semi-permanent constructions on the drain alongside the service lane. The sheds works have been taken down in the last 2 weeks. The semi-permanent structures were visibly demolished. The locals do not claim they were eligible for compensation		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
149	226+600	RHS	Old Two Room	Permanent	Temporary moveable encroachments both side.	Removed	NA	N/A	N/A	N/A	On the day of the site visits these rooms were found to have been removed. The JMTPL executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
150	224+000to225+000	RHS	Village - Meena Paldi	semi Permanent	Temporary moveable encroachments both side.	Removed	ROW	15	No	NO	Most of the dwellings in this track believed to be encroachments were temporary shed works or semi-permanent constructions on the drain alongside the service lane. The sheds works have been taken down in the last 2 weeks. The semi-permanent structures were visibly demolished. Moreover, the locals did not protest and had no compensation issues.		Removed Structure	Removed Structure
151	224+000to223+000	RHS	Village-Purani Chungi Town	semi Permanent	Temporary moveable encroachments both side.	Removed	ROW	15	No	NO	Most of the dwellings in this track believed to be encroachments were temporary shed works or semi-permanent constructions on the drain alongside the service lane. The sheds works have been taken down in the last 2 weeks. The semi-permanent structures were visibly demolished. Moreover, the locals did not protest and had no compensation issues.		Removed Structure	Removed Structure
152	223+000to222+000	RHS	Village-Bagharana	semi Permanent	Temporary moveable encroachments both side.	Removed	ROW	15	No	NO	Most of the dwellings in this track believed to be encroachments were also temporary shed works or semi-permanent constructions on the drain alongside the service lane. The sheds works have been taken down in the last 2 weeks. The semi-permanent structures were visibly demolished. Moreover, the locals did not protest and had no compensation issues.		Removed Structure	Removed Structure

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153	220+000to221+000	RHS	Kanota Town	semi Permanent	Temporary moveable encroachments both side.	Removed	ROW	15	No	NO	Row of shops owned by one Sitaram (Ph:09636116211) around a bend in the road and off the red lights at the town crossing. They claim that they have been paid less for their land, which has been acquired twice. First time, as they claim, it was for widening the road. The second time, they say that the company took more land owing to some design change in the bend of the road and compensated them unfairly. Whether or not they have a lawsuit going on could not be ascertained as the son of the owner, who was interviewed, did not have that information. Disputed are: Approx 30X3m Occupation since last 30 years		Information gap	Information not available
154	218+040	RHS	Dargah, House	Permanent	Mazar	Notice to be issued before drive encroachment	ROW	40	No	No	The caretaker claims no one has ever approached with a vacation proposal. Covered area: approx 200 m2(15X10,10X5). No details of any compensation claims or notices could not be obtained from the caretaker. The Dargah premises contains the living quarters as well. The entire establishment lies in the ROW. The dargah is claimed by Munshi, the caretaker, to be at least 50-60 years old.		Information gap	Information not available
155	214+050	RHS	Boundary Wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	15	N/A	N/A	Occupants could not be found here. Therefore the details of any disputes going on could not be ascertained. The area that lies in the ROW is approx 350m2(70X5). The structure is only a white wall which is used as a fence and there is only one room constructed inside their for the purpose of caretaker's quarters. However, the family living adjacent to this site act as caretakers for the plot of land. However, they could not be contacted for the purpose of obtaining this information.		Information gap	Information not available
156	213+870	RHS	Old Borewell & Water Tank	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	20	Yes	No	Lies in village Mansar Khedi Lies in ROW Owner: Banwari Lal Have received compensation for construction and land in 2008. but believes is not compensated well for the land. Has not filed a case though.		demand for more compensation	Compensation is pending
157	213+130	RHS	Boundary Wall	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	20	N/A	N/A	Information about any disputes could not be found out as the caretaker, an old lady, was alone in the premises. The encroachment is a stone wall approx. 3 feet high. It is approx 20X5m		Information gap	Information not available
158	212+900to213+000	RHS	Bainada Chok	semi Permanent	Temporary moveable encroachments both side.	Removed	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
159	211+270	RHS	House	Permanent	Govind ram meena Vill.-Biharipura mode(Bassi)	Notice to be issued before drive encroachment	ROW	25	No	No	Reportedly no compensation issues are outlying at this site and have received no formal notices. The site had a visit from recently by JMTPPL executives and were asked to not extend their encroachment any further which the owner wishes to comply with. Temporary shed is being used as an animal shelter. A tubewell also exists but it was reportedly JMTPPL's property and they themselves installed it. The owners have been there for about 25 years		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
160	211+150	RHS	House	Permanent	Harshay meenavill.-Bassi	Notice to be issued before drive encroachment	ROW	15	Yes	No	The site looked to have been demolished in the recent past and they have since then reclaimed the ROW with temporary structures such as a shed. The owner did not report any compensation issues. The property is a restaurant the owner did not communicate freely over the phone and the staff claimed to have no information of any notices.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
161	211+070	RHS	Tyre Puncture Shop	semi Permanent	Sishpal meena Vill.-Bassi	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
162	210+600	RHS	Boundary Wall & Tin Shade	Permanent	Unknown	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
163	210+100 to 209+400	RHS	Bassi Town	semi Permanent	Temporary moveable encroachments both side.	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
164	208+970to208+830	RHS	Temple, House & Water Tank	Permanent	Mr. Mool Chand	Notice to be issued before drive encroachment	ROW	30	Yes	No	A case regarding unfair compensation against this property is going on in the Jaipur High Court since 2009, The owner believes they have been unfairly compensated. Therefore, he did not collect the compensation funds (of the order of Rs 30,00,000) claiming that the land is worth Rs 1 crore. However, the demolition on stay notice till December 2014. The coverage area in the ROW is aprox. 30X6 m and built up area include a house, a temple and open area. The owner have been there for 25-30 years	Punch Listed	court cases	court cases
165	207+570 to 207+630	RHS	Village-Mohanpura	semi Permanent	Temporary moveable encroachments both side.	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
166	206+870	RHS	Shiv Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	30	No	No	Only an edge of the temple is under the ROW therefore the owner claims he has not received any notices. Claims, if in the future he receives any such offer, will gladly accept the compensation terms and remove the temple edge. The temple has been there for 25-30 years.		compensation is yet to be given	Compensation is pending
167	206+000	RHS	Village-Doodhali	semi Permanent	Temporary moveable encroachments both side.	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
168	204+200	RHS	One Room	Permanent	Unknown	Removed	NA	N/A	N/A	N/A	The structures were removed before the site visit. The jmtpl executive pointed to the empty land where they stood.		Removed Structure	Removed Structure
169	202+410	RHS	House, Boundary wall	Permanent	Bhagwan shay meena Vill.-Jhar,9799882792	Notice to be issued before drive encroachment	ROW	N/A	N/A	N/A	The owner could not be obtained for comments. The encroachment is a stone wall approx. 3 ft high and the covered area is approx. 20X3m		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
170	202+350	RHS	Meena shop	Permanent	Bhagwan shay meena Vill.-Jhar,9799882792	Notice to be issued before drive encroachment	ROW	30	Yes	No	The caretaker/tenant claims he has not received any notice and the owner has not faced any legal issues over their property. Moreover, both the properties belong to the same owner who owns the property mentioned at S.No. 169 above. Shop and a temple are alongside. Shop tenant says the shop has been there for over 30 years and the temple still older.		Information gap	Information not available
171	202+250	RHS	Jhar Bawri	Permanent		Notice to be issued before drive encroachment	ROW	400	N/A	N/A	The baori is government property and is reportedly of historical concern. It lies directly opposite the road to the above mentioned shop and temple in S.No. 170		Historical monument	Govt Structure

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172	202+220	RHS	Wood Work Shop & Tin Shade	Permanent	Moolchand Jangir Vill.-Jhar	Notice to be issued before drive encroachment	ROW	25	Yes	Yes	Wood work shop and tin shade belong to different owners. Both say only a small fraction of their properties are in the ROW but they are permanent structures. They have received notices recently to remove their properties and have agreed to let the authorities remove a part of their sections from the ROW.		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
173	201+975	RHS	House,Boundary wall	Permanent	Kajor mal Meena Vill.-Jhar	Notice to be issued before drive encroachment	ROW	40	No	Yes	The owner is ready to move the boundary wall backwards. Owner is named Mahender who lives in Vadodara, Kajormal Meena, his father, is now deceased. The owner has been present their for about 40 years,		Remove structure if asked	Not eligible for compensation
174	201+725	RHS	House,Boundary wall	Permanent	Jagdish kumar Vill.Jhar	Notice to be issued before drive encroachment	ROW	30	No	No	Agree to move the wall backwardsPresent on this site since 25-30 years		Remove structure if asked	Not eligible for compensation
175	201+200	RHS	House,Boundary wall	Permanent	Mohan lal Vill.-Jhar,9928724137	Notice to be issued before drive encroachment	ROW	40	No	No	Agree to move the wall backwardsPresent since 30-40 years		Remove structure if asked	Not eligible for compensation
176	201+000	RHS	House,Boundary wall	Permanent	Kalyan meena	Notice to be issued before drive encroachment	ROW	50	Yes	No	Eligible for compensation; offered 18 lakhs, but refused to take the compensation. Instead filed a case with the Revenue court in Jaipur. Present since 50-60 years The encroached area contains house and a yard in front of it. Both of these lie on the service road. Approx area is 30X10m		court cases	court cases
177	200+925	RHS	Shop	Permanent	Badri lal meena Vill.-Banskho,9829763722	Removed	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
178	200+900	RHS	Water Tank	Permanent	Ramniwas Meena	Notice to be issued before drive encroachment	ROW	60	Yes	No	Eligible for compensation. However, compensation has not been claimed so far owing to internal dispute between the family. Ramnivas Meens, now deceased, has a brother Jootaram. So a dispute is raging between Ramnivas's son, Ramesh and Jootaram as to the division of the compensation money. Ramesh says that the compensation amount is fair and is ready to remove the boring from within the ROW. Have been present for 50-60 years		court cases	court cases
179	200+800	RHS	Shop	Permanent	Lalu ram Vill.-Kanetha,8769242400	Removed	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
180	200+820	RHS	Shop	Permanent	Shankar lal meena Vill.- Banskho	Notice to be issued before drive encroachment	ROW	40	Yes	No	The owner's shop and the borewell has been demolished. He accepts the demolition meanwhile claims he has been compensated 4 lakhs for the boring but nothing for the shop. He says this case is under consideration of the SDM, Bassi The owner has been present for around 40 years. The shop 15-20 years. The shop could have been a permanent structure but right now is a temporary shed		court cases	court cases

S.No	Chainage	Side	Description	Type of Encroachment	Address	Remarks by JMTPL as on 2012	Inside ROW @ or Carriageway/Service Road (C/S)	Occupation Since when (Approx. in years)	Compensation Received Yes/No	Notice Received Yes/No	Remarks/demolition observed by ERM based on field verification as September 26-27, 2014	Items Punch Listed	Remarks 2	Status of Compensation
181	200+750	RHS	Hanuman Ji Temple	Permanent	Temple	Notice to be issued before drive encroachment	ROW	60	Yes	No	Has not yet been demolished. Locals did not seem to know if an alternate site has been allocated but seemed firm that it is not going to be relocated. The land belongs to the Jar village panchayat Has been present for 50-60 years, perhaps before		Information gap	Information not available
182	200+400	RHS	Old Borewell & Room	Permanent	Shankar lal meena Vill.-Khorl (Banskho)	Notice to be issued before drive encroachment	ROW	40	Yes	No	The owner's shop and the borewell has been demolished. He accepts the emolition meanwhile claims he has been compensated 4 lakhs for the boring but nothing for the shop. He says this case is under consideration of the SDM, Bassi The owner has been present for around 40 years. The shop 15-20 years. The shop could have been a permanent structure but right now is a temporary shed		court cases	court cases
183	199+925	RHS	House	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	50	Yes	No	Eligible for compensation but it has not been claimed so far. There is a borewell alongside the shack. Owner claims once he goes to claim the compensation, he'll move from the ROW. The house structure is a temporary structure present since 40-50 years		Refused to compensation	Pending Compensation
184	199+450	RHS	House	Permanent	Kanaram Vill.Khorl, 9829407404	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
185	199+100	RHS	House Wall	Permanent	Bhore lal Meena Vill.Banskho	Notice to be issued before drive encroachment	NA	15	No	No	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
186	198+600to198+570	RHS	House & Shops	Permanent	Bhore lal Meena Vill.Banskho, 9887915279	Removed	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
187	196+700	RHS	Shop & Platform	Permanent	Unknown, 9414626093	Notice to be issued before drive encroachment	ROW	15	No	No	Not eligible for compensation. Encroachments are essentially temporary structures such as sheds or the owners use the ROW to store their raw material. This shop has been rented out to the tenant since the last 10-15 years. The owner could not be contacted		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
188	196+650	RHS	Hotal & Shop	Permanent	Kapil gupta	Notice to be issued before drive encroachment	ROW	15	No	No	Not eligible for compensation. Encroachments are a ramp and an uncovered porch. The hotel administration will present no resistance to the authorities reclaiming their ROW and damaging the hotel's temporary encroachment		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
189	193+700	RHS	Hanuman Temple & Darghah	Permanent	Temple & Mazar	Notice to be issued before drive encroachment	ROW	40	No	NO	They deny not having received any eviction notice and believe they will not be asked to relocate They do not think they are eligible for any compensation Have been present for atleast 40 years as their caretakers claim		Information gap	Information not available

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190	190+350	RHS	House & Boundary wall	Permanent	Kajor mal Thekedar Vill.Dayalpura	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	On the day of the site visit, the boundary wall was found to be behind the ROW and the owners did not have any compensation issues		Not in ROW	Not eligible for compensation
191	188+100	RHS	Old Borewell	Permanent	Unknown	Notice to be issued before drive encroachment	NA	N/A	N/A	N/A	On the day of the site visit, Sep 26-27, 2014 the temporary dwellings were found to have been removed		Removed Structure	Removed Structure
192	188+750	RHS	Shop & Platform	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	15	No	No	The tenant believes the owner was not eligible for compensation and does not know how long the structure has been there. Moreover the encroachment is a temporary projection and he agrees to remove it as and when required		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
193	184+400	RHS	Shop	Permanent	Kailash sharma, 8107822407	Notice to be issued before drive encroachment	ROW	15	No	No	The tenant believes the owner was not eligible for compensation and does not know how long the structure has been there. Moreover the encroachment is a temporary projection and he agrees to remove it as and when required		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
194	184+350	RHS	Shop & Platform	Permanent	Unknown	Notice to be issued before drive encroachment	ROW	15	No	NO	The tenant believes the owner was not eligible for compensation and does not know how long the structure has been there. Moreover the encroachment is a temporary projection and he agrees to remove it as and when required		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
195	183+300	RHS	RTDC Boundary Wall	Permanent	RTDC Rajasthan	Notice to be issued before drive encroachment	ROW	30	N/A	N/A	Permanent structure and a property of the Government of Rajasthan.		Govt	Govt Structure
196	183+075to182+500	RHS	Dausa Bypass	Permanent	Tin sheet & surface	Notice to be issued before drive encroachment	ROW	10	No	No	Most of the tenants who were contacted in this stretch do not believe the owners of these properties had compensation claims. Encroachments are temporary projections and the tenants agree to remove them as and when required		opportunistic Temporary Squatting on Govt Land not eligible for compensation	Not eligible for compensation
197	182+780	RHS	Electric Pole	Permanent	RSEB Dausa	Notice to be issued before drive encroachment	ROW	N/A	N/A	N/A	Permanent structure and a property of the Government of Rajasthan.	Punch Listed	Govt	Govt Structure

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