

Final Report

AECOM







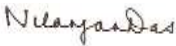


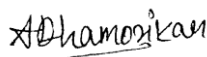
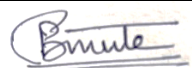


Environment & Social Due Diligence of Transmission Lines, India

India Grid Trust

3 January 2023

Delivering a better world

Quality information

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Abbreviations

S. No.	Abbreviation	Extension
1.	AMC	Annual Maintenance Contract
2.	BDTCL	Bhopal Dhule Transmission Company Limited
3.	CAP	Corrective Action Plan
4.	CEA	Central Electricity Authority
5.	CERC	Central Electricity Regulation Commission
6.	CGWA	Central Ground Water Authority
7.	CKMS	Circuit Kilometres
8.	CP	Condition Precedent
9.	CPCB	Central Pollution Control Board
10.	CPR	Cardio Pulmonary Resuscitation
11.	CS	Condition Subsequent
12.	CTE	Consent to Establish
13.	CTO	Consent to Operate
14.	D/C	Double Circuit
15.	E&S	Environmental and Social
16.	EC	Environmental Clearance
17.	EHS	Environment, Health and Safety
18.	EHV	Extra High Voltage
19.	EIA	Environmental Impact Assessment
20.	ESAP	Environmental and Social Action Plan
21.	ESDD	Environmental and Social Due Diligence
22.	ESMP	Environmental and Social Monitoring Plan
23.	ESMS	Environmental and Social Management System
24.	FC	Forest Clearance
25.	GHG	Green House Gases
26.	GPN	Good Practice Note
27.	HOD	Head of Departments
28.	HR	Human Resources
29.	HSE	Health, Safety and Environment
30.	ICC	Internal Complaint Committee
31.	IFC	International Finance Corporation
32.	ISO	International Standards Organization
33.	JTCL	Jabalpur Transmission Company Limited
34.	MoEF & CC	Ministry of Environment and Forest & Climate Change
35.	MPPTCL	Madhya Pradesh Power Transmission Co. Ltd.
36.	MSETCL	Maharashtra State Electricity Transmission Company
37.	MTL	Maheshwaram Transmission Limited
38.	MVA	Mega Volt Amperes
39.	MW	Mega Watt
40.	NGO	Non-Governmental Organization
41.	NOC	No Objection Certificate
42.	O&M	Operation and Maintenance
43.	OGPTL	Odisha Generation Phase -II Transmission Limited
44.	OPGC	Odisha Power Generation Corporation
45.	PKTCL	Purulia & Kharagpur Transmission Company Limited
46.	PPE	Personal Protective Equipment
47.	PS	Performance Standards
48.	PUC	Pollution Under Control
49.	QHSE	Quality, Health, Safety and Environment
50.	RAPP	Rajasthan Atomic Power Project
51.	RTCL	RAPP Transmission Company Limited
52.	S/C	Single Circuit
53.	SPCB	State Pollution Control Board
54.	SS	Sub Station

S. No.	Abbreviation	Extension
55.	TL	Transmission Line

1. Introduction

India Grid Trust (here after referred to as 'India Grid' or 'IndiGrid' or 'the Client') owns, operates, and manages power transmission networks and renewable energy assets in India.

IndiGrid intends to carry out a desktop Environmental & Social (E&S) screening of six (06) transmission line assets followed by an Environment & Social Due Diligence (ESDD) for shortlisted five assets (hereinafter referred as 'Project'). For this purpose, IndiGrid has engaged AECOM India Private Limited (hereinafter referred to as 'AECOM') to undertake the screening and ESDD of the same. The transmission assets are located across the states of India.

1.1 Project Background

AECOM understands that IndiGrid's Portfolio Assets comprise of thirteen power transmission projects located across several states in India. These projects comprise of 38 EHV overhead power transmission lines, comprising seven 765 kV transmission lines, twenty-nine 400 kV transmission lines and two 132 kV transmission lines, with a total circuit length of approximately 7,570 ckms and eleven substations with approximately 13,550 MVA of transformation capacity, across 17 states and 1 union territory, in India¹.

A total of 6 transmission line assets were covered under this project for the first stage of desktop E&S screening exercise. The findings of the screening report informed the shortlisting of five assets by client for ESDD. Details of the transmission line assets considered for desktop E&S screening and ESDD are as follows:

Table 1-1: IndiGrid Transmission Assets

Sr. No	Asset Name	Desktop E&S Screening	ESDD	Asset Details
1.	Jabalpur Transmission Company Limited (JTCL)	Assessed	Assessed	Section 3.1
2.	Maheshwaram Transmission Limited (MTL)	Assessed	Assessed	Section 3.2
3.	Purulia & Kharagpur Transmission Company Limited (PKTCL)	Assessed	Assessed	Section 3.3
4.	RAPP Transmission Company Limited (RTCL)	Assessed	Assessed	Section 3.4
5.	Odisha Generation Phase – II Transmission Limited (OGPTL)	Assessed	Assessed	Section 3.5
6.	Bhopal Dhule transmission Company Limited (BDTCL)	Assessed	Not shortlisted for ESDD	Not applicable

1.2 Objectives of Desktop E&S Screening & ESDD

- Perform desktop screening, identifying areas of concern for the 6 assets (as provided in Table 1-1) to identify any E&S risks;
- Based on the screening exercise, IndiGrid will shortlist assets for further assessment through the full ESDD;
- ESDD for shortlisted assets only - develop a due diligence report for key non-compliance issues related Environment & Social aspects (as provided in Table 1-1);
- Development of Environmental and Social Corrective Action Plan (CAP) for the shortlisted assets incorporating CP/ CS (Condition Precedent/ Condition Subsequent) items if any, timelines, deliverables, and responsibilities, to address any gaps or issues identified.

¹ <https://www.indiGRID.co.in/portfolioassets/> accessed on 7 Jan 2022

1.3 Applicable Reference Framework

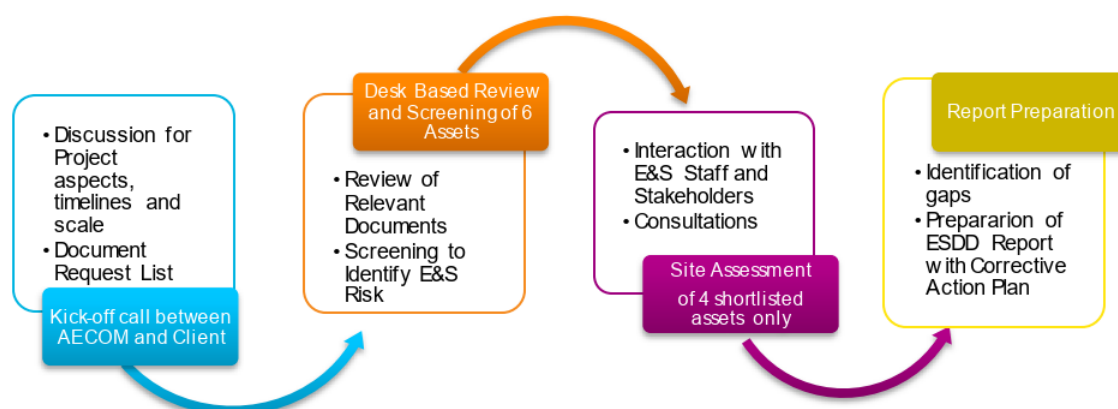
The reference framework used of this study is:

- IFC Performance Standards on Environmental and Social Sustainability, 2012;
- World Bank Group / International Finance Corporation (IFC) Environment, health, and safety (EHS) Guidelines, 2007;
- IFC sector-specific EHS Guidelines for Electric Power Transmission and Distribution, 2007;
- Applicable local, national, and international environmental and social legislations.

1.4 Approach and Methodology

The following approach and methodology was adopted for the project which has been broadly divided into three tasks, namely:

- Project Kick off and Documentation Review;
- Site visit and consultation with site officials and corporate review to assess corporate level policies and procedures with respect to EHS and Social and their compliance status; and
- Reporting.



1.4.1 Project Kick off and Documentation Review

Project kick off meeting was conducted on 06 December 2021 between AECOM and IndiGrid representatives to understand the project related aspects, scale of the projects, project timelines, etc. AECOM prepared the list of applicable environment, health & safety and social documents that were required to be reviewed as part of the assessment and the same was shared with client in the form of 'Documentation Request List' after the kick-off meeting. The details were shared from IndiGrid in a shared Data room. These documents were reviewed by AECOM environment, health, safety, social and ecology team members.

List of documents reviewed as part of this assessment is provided in **Appendix A** of this report.

1.4.2 Site Visit and Corporate Review

AECOM conducted the site visits and consultations between 30th January to 6th February 2022 and 22nd to 24th March 2022, by AECOM team comprising of EHS, social and biodiversity expert. As agreed, site visits were limited to 2 to 3 days per asset, considering COVID scenarios. Site visits were undertaken in order to assess the status of the projects, environment and social issues associated with the project during operation phase. E&S documents which were made available by IndiGrid team to AECOM team were reviewed at site such as wage records, GRM records, etc. Furthermore, discussions with Corporate Team of IndiGrid were carried out to understand corporate level E&S policies and procedures adopted by the Company. Consultation were carried out with local community such as land owners, Forest Dwellers, forest officials, etc.

1.4.3 Reporting

Post site visits, this ESDD report was prepared based on the issues identified during the site visit and review of documents provided by IndiGrid. An Environmental and Social Corrective Action Plan (ESCAP) has been developed as part of this report providing mitigation measures for addressal and closure of the gaps identified.

1.5 Limitations / Disclaimer

This report presents the observations made by AECOM's professionals based on the scope of work and agreed approach and methodology with IndiGrid. The present report has been developed to identify the potential EHS and social issues and conditions associated with the activities of the project for which the assessment has been carried out. During the course of this assessment, AECOM has attempted to independently assess the potential presence of E&S issues or conditions within the limits of the established scope of work as described in the contract between IndiGrid and AECOM.

The study / audit / assessments is/are based on the information and documents received by us, and the site conditions as witnessed by us at the time of the inspection. As with any assessment exercise, there is a certain degree of dependence upon verbal information provided by the point of contact for assessment, limited number of documents available for review and information available in the public domain, which is not readily verifiable through visual observations or supported by any available written documentation. During the course of the site assessment, AECOM has attempted to independently assess the potential presence of such conditions within the limits of the established scope of work as described in the proposal. However, verification of potentially important facts is not always possible. AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by site representative at the time this assessment was performed. The assessment is based on sample site visits carried out by AECOM. This report is to be used to understand the overall E&S requirements rather than performance as this is sample based study and not comprehensive ESDD.

This report has been prepared by AECOM for the benefit of its client, IndiGrid. AECOM's client may release the information to third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by any party shall be solely at the risk of such party and without legal recourse against AECOM, its parent, its subsidiaries and affiliates; or their respective employees, officers, or directors; regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent, or other negligence and strict liability of AECOM), statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

IndiGrid must not in any way (directly or indirectly) provide, allow or enable the AECOM's documents to be included or referred to in any written material or relied upon by any third party. No party other than the Client shall have the right to rely on the AECOM's documents rendered in connection with the works. IndiGrid shall indemnify and hold harmless AECOM in respect of any claim or loss claimed whether in contract, tort or by statute, by any third party in respect of use or reliance on any of the Consultant's documents or opinions.

The environmental and social assessment for IndiGrid is based on the documents made available for review, discussions with site personnel and observations from the site walkthrough of the sample project sites as well as the potential project sites (where investment is probable) undertaken by AECOM professionals at the site during the assessment process. Wherever documentation, policies and procedures for evaluation were not available for review, it has been presented in the report at relevant sections. In addition, wherever AECOM has not been able to make a judgment or assess any process, it has been presented as an information gap and a way forward has been suggested.

The assignment was carried out during pandemic conditions related to the Coronavirus disease (COVID-19). This health emergency has been impacting multiple facets of the life including, without limitation, labour, personnel, manufacturing, equipment, materials, transportation and related supply chains, and tasks such as travel for site visits and obtaining environmental database reports and other data from government agencies, all of which have the potential to adversely impact the critical path of the project. AECOM had taken all reasonable care to mitigate the potential impact of the Coronavirus to the extent within AECOM's reasonable control.

2. Overview of IndiGrid and its Assets

2.1 Organisational and Company Profile²

IndiGrid [BSE: 540565 | NSE: INDIGRID] is India's first and largest Infrastructure Investment Trust (InvIT) in the power transmission sector. It owns, operates, and manages power transmission networks and renewable energy assets that deliver reliable power throughout India. IndiGrid was established on October 21, 2016 and is registered with SEBI following the InvIT Regulations. IndiGrid's Portfolio Assets comprise of thirteen power transmission projects located across several states in India. These projects comprise of 38 EHV overhead power transmission lines, comprising seven 765 kV transmission lines, twenty-nine 400 kV transmission lines and two 132 kV transmission lines, with a total circuit length of approximately 7,570 ckms and eleven substations with approximately 13,550 MVA of transformation capacity, across 17 states and 1 union territory, in India. Majority of their Portfolio Assets have in place long-term TSAs of 35 years or 25 years (in case of ENICL and JKTPL) from the scheduled commercial operation date of the relevant Portfolio Asset. The TSAs have a contract term of 35 years or 25 years (in case of ENICL and JKTPL) from the scheduled commercial operation date, after which they can apply to CERC for renewal if not unilaterally extended by CERC.

IndiGrid Investment Managers Limited (IIML) is the Investment Manager for IndiGrid. The Investment Manager is responsible for the operations pertaining to the Trust, such as distribution of cash flows, acquisition/divestment of assets etc. IIML executed Investment Management Agreement with IndiGrid on November 10, 2016. As per the provisions of the Investment Management Agreement, IIML is empowered to:

- Take all decisions in relation to the management and administration of IndiGrid's assets and the investments of IndiGrid;
- Oversee the activities of the Project Manager (IndiGrid) in terms of the InvIT Regulations and applicable Law;
- Issue and allot units, accept subscriptions to Units of IndiGrid and issue, transfer units to Unitholders or such other persons and undertake all related activities;
- Focussed teams engaged in asset management, M&A, capital raising, compliance, engineering and finance & accounting.

As on March 31, 2021, unit holders approval for change in control of the Investment Manager of IndiGrid is already in place. KKR currently owns 74% stake in IIML.

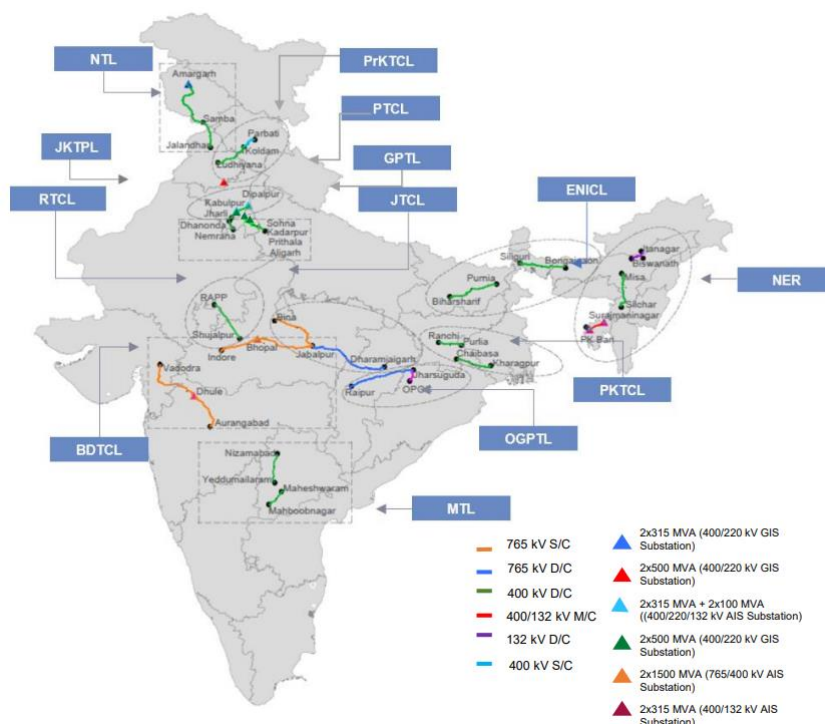


Figure 2-1: IndiGrid Trust Assets

² <https://www.indigrid.co.in/about-us/> accessed on 5 April 2022

2.2 Organisational Structure

IndiGrid has established an institutional structure for effective and consistent implementation of the ESMS. This includes the identification of designated personnel at IndiGrid who will be in charge of effective implementation and roll out of this ESMS at all levels of the organisation. The Key Management Team/ Leadership Team that drives the functioning of IndiGrid will be overall responsible for driving the execution of the ESMS across levels. This team comprises of the Chief Executive Officer (CEO), Chief Operating Officer (COO), Chief Design Officer (CDO), Chief Investment Officer (CIO), Chief Finance Officer (CFO) and the Company Secretary/ Legal Counsel. The Key Management Team/ Leadership Team reports to the Board of Directors, whose obligation is to report to the investors and unitholders.

There is a qualified and dedicated E&S team in place at the corporate level while the asset level O&M as well as HSES management has been sub-contracted to qualified contractors. The IndiGrid ESG Lead is the independent resource at the corporate level who is responsible not only for the ESMS implementation, but also for driving IndiGrid's E&S performance. As per ESMS manual, ESG and EHS positions are separate, but IndiGrid is still in the initial stage of ESMS implementation and till recently EHSS Lead's responsibilities were managed by EHS Head who reports to VP Operational Excellence. As per the ESMS, the proposed organisational structure and the HSE affairs committee organogram is presented below in Figure 2.2 and 2.3 respectively.

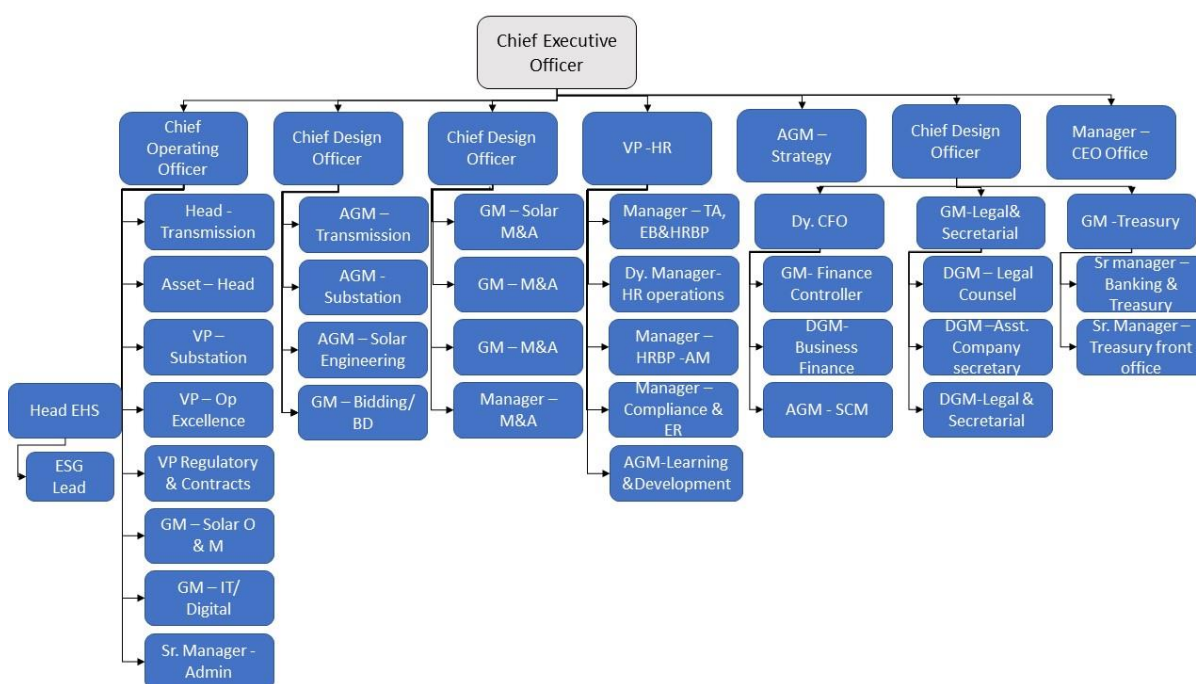


Figure 2-2: Corporate Organization Structure of IndiGrid

IndiGrid has established a Health, Safety and Environment (HSE) department with defined roles & responsibilities for team members. Central safety committee is made up of the hub manager (who serves as chairman), all department heads, the safety supervisor, and the physician. The safety supervisor usually serves as permanent secretary. This committee originates, guides, and coordinates the overall safety effort, reviews investigations of serious injuries and major incidents, approves operating locations/hub safety policies, and, in general, deals with safety matters of wide concern. This committee meets at least once a month and maintains minutes. HSE Organogram is presented in **Figure 2-3**.

As per ESMS manual, ESG and EHS positions are separate, but IndiGrid is still in the initial stage of ESMS implementation and till recently EHSS Lead's responsibilities were managed by EHS Head who reports to VP Operational Excellence. IndiGrid will appoint an EHSS lead at the Corporate Level who will be overall responsible for the implementation of the ESMS and obligations under the ESAP and designate and define clear responsibilities for suitably qualified and accountable people for E & S performance and ESAP implementation for the portfolio.



Figure 2-3: EHS Organogram of IndiGrid

2.2.1 Environment, Social and Governance Committee

The ESG Lead is the independent resource at the corporate level who is responsible not only for the ESMS implementation, but also for driving IndiGrid's E&S performance. Administratively, the ESG Lead reports to the VP-Operational Excellence, however functional reporting is to the CEO and COO.

Responsibilities of ESG lead are:

- Ensuring compliance of existing and future operations of IndiGrid with respect to the applicable national laws, rules and regulations, permits pertaining to Environmental, Safety, Health and Social as well as international best practices;
- Assist the Asset Acquisition Team in screening assets for identifying potential environmental and social risks in case of asset acquisition as per the IFC Exclusion List;
- Advise the Asset Acquisition Team on matters related to E&S issues identified early in the asset acquisition/ investment process, including findings from the due diligence process, and provide recommendations accordingly;
- Assess E&S compliance adequacy through review of performance reports submitted by assets and validate corrective measures if any, track and monitor the closure of corrective actions, and report to the Board on E&S performance;
- Prepare correction or appends (as may be necessary) to ESMS Procedures so as to meet requirements of the Applicable Reference Framework and E&S policy objectives;
- Understand the current capacity of the asset level teams in terms of E&S management and advise HR Team on addressing those gaps through recruitment, training and capacity building;
- Develop asset specific E&S management plans based on requirements of the ESMS;
- Advise the Supplier and Contracts Management Team on selection of contractors & suppliers based on E&S selection criteria, and assist them on evaluation of contractors & suppliers;
- Communicate effectively with asset team regarding E&S policy, inspections, accidents and incidents, ensuring that accidents and dangerous occurrences are reviewed and responded;
- Inform and consult with external E&S Specialists and consultants as and when necessary;
- Conduct training of O&M teams at asset level;
- Preparation of the E&S Portfolio Monitoring Reports for Investors and other stakeholders, as necessary.

The ESG Lead ensure that all social aspects relating to internal and external grievance redressal be managed effectively as per procedures outlined in the ESMS. The ESG Lead will coordinate with the corporate HR Team for documenting regulatory compliances as per the Indian labour laws. Other responsibilities of the ESG Lead includes:

- To ensure that HR Policy and Procedures are established and outlined whilst incorporating HR framework and labour requirements as per Indian laws and IFC Performance Standards.
- To ensure that the grievance redressal system for both internal staff and for addressing external grievances that may be received from the community during the asset life are established and implemented.

2.3 Environment and Social Management System

IndiGrid is an ISO certified company with Integrated Management System certification covering ISO 9001:2015, 14001:2015 and 45001:2018 valid till 07th April 2024 for management of assets including operation and maintenance of EHV transmission lines and substation, technical support, merger & acquisition, legal, finance, human resources, health safety & environment, quality, procurement, regulatory & contracts, administration and information technology.

IndiGrid acknowledges that the current portfolio assets of IndiGrid and pipeline of future assets may have risks and impacts of varying significance on one or more environment and social aspects in cognizance of the geographic context, nature and scale of operations. These risks and impacts, if not identified prior to asset acquisition, can have implications on financial returns, business continuity and reputational risks. More specifically, key E&S risks and issues associated with this project include: implementation of environment and social management system (ESMS) and staffing to undertake the project in accordance with IFC PSs; engagement with stakeholders and affected community during project operations, primarily related to health and safety of the landowners and users and access to the right of way; assurance of fair, safe and healthy working conditions for employees and contracted workers and consistent management of occupational health and safety (OHS); ongoing mitigation of any damage to land and assets under the towers and Right of Way, management of biodiversity issues at a few locations across all the lines with longer term monitoring; and culturally appropriate engagement with Indigenous communities wherever the lines pass through IP areas. IndiGrid has developed Environmental and Social Management System (ESMS), Nov 2020, with the help of third-party consultant which is applicable across all levels of its business which now acts as guide for the identification and management of environment, safety and social potential risks associated with their operations. The ESMS defines relevant good international industry practices (GIIP) so as to mitigate the risks at every stage of the project. The ESMS requires each of the assets to develop a site specific Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP) and Grievance Redressal Mechanism. The ESMS requires the Asset Acquisition Team to undertake an asset screening and risk assessment prior to any new acquisition. E&S risk assessment has not been done prior to acquisition for assets that were acquired before the ESMS was developed. The ESMS has adequate provisions in place for monitoring. This ESMS however is in the early stages of implementation at the SPV and asset level.

This ESMS provides IndiGrid with a management framework for assessment of the risks and impacts (direct or indirect) from the asset operations and associated mitigation measures to either eliminate or reduce them to a considerable extent. The ESMS also defines relevant good international industry practices (GIIP) so as to mitigate the risks at every stage of the project.

The governing principles of the ESMS are based on 'Plan', 'Do', 'Check', and 'Act' cycle (PDCA). Based on the PDCA cycle, the ESMS will effectively include systems and procedures on the following:

- a) Commitment, and establishing a policy statement;
- b) Identifying, and ensuring compliance with Applicable Reference Framework requirements;
- c) Identifying risks and developing objectives, targets and programmes / procedures for identified risks;
- d) Implementation and operation of ESMS;
- e) Checking, auditing and review; and
- f) Implementation of corrective action measures.

The ESMS is expected to evolve as IndiGrid expands its business operations, suiting the requirements of the specific regions, states or sectors, for that matter. It is expected that the team responsible for implementation of the ESMS will review and revise this system on periodic basis to incorporate the changing needs.

2.3.1 Environment and Social Policy

The Environmental and Social (E&S) Policy of IndiGrid defines E&S objectives and principles for its operations, which will guide the organisation in achieving its performance goals in compliance with the Applicable Reference Framework for ESMS. Applicable reference framework for ESMS was:

- National and Local legislations related to EHS and Social aspects applicable to the power transmission and solar energy sector,
- IFC Performance Standards 2012,
- IFC/WB General EHS Guidelines,
- IFC/WB EHS Guidelines for Electric Power Transmission and Distribution,
- Sustainability Accounting Standards Board (SASB) Materiality Standards,
- MSCI ESG Indices,
- United National Sustainable Development Goals (UN SDGs),
- Global Reporting Initiative (GRI) Standards.

This Policy is applicable to all of IndiGrid's portfolio assets, business partners and contractors. The E&S Policy is further applicable to all direct and indirect employees and workers of IndiGrid and its portfolio assets. IndiGrid believes that effective management of E&S issues is fundamental to success. IndiGrid is committed towards continually improving its E&S performance by setting up and monitoring of objectives and targets, periodic audits, necessary training, engagement with stakeholders, coordination with investors, and management review.

IndiGrid commits to compliance to the Applicable Reference Framework and enhancement of E&S Performance of the company and its portfolio assets through implementation of responsible E&S management processes and preventive measures in order to avoid, eliminate, control, minimize and mitigate environmental and social risks and impacts across all existing and future assets. Environment and Social Policy of IndiGrid endeavour to:

- o Ensure that all activities undertaken by the Assets comply with the Applicable Reference Framework;
- o Select suppliers and contractors, including sub-contractors considering their ability to operate in environmentally and socially responsible manner, and to provide safe and healthy work environment to their employees and workers, in compliance with this Policy, other applicable Policies, the IndiGrid's Environmental and Social Management System and specific Environmental, Health, Safety and Social contractual requirements;
- o Screen assets against the established eligibility and screening criteria reflecting this Policy's commitments and the Reference Framework, and subsequently identify and assess E&S risks and impacts, and mitigate and manage those in accordance with Reference Framework;
- o Protect the environment and the community against impacts generated because of activities across assets and routine operations, as well as unplanned events, by effectively implementing mitigation measures and robust Environmental and Social Management Plans proportionate to the specific risks and impacts identified and assessed, and ensure that residual impacts comply with the Reference Framework;
- o Develop occupational health and safety and emergency response related awareness amongst contractors, including sub-contractors, as well as direct and indirect employees and workers engaged for the asset, to prevent occurrence of accidents (personnel injuries and property damage) and occupational illness;
- o Strictly prohibit engagement of child labour, bonded labour, discriminatory/ disciplinary practices and placing restrictions on employees' rights of association across all operations and assets;
- o Maintain strict policies that enable ethical behaviour and prohibit bribery and other improper payments to public officials consistent with the laws and corruption acts;
- o Safeguard the interests of stakeholders and affected communities through periodic engagement, participation and information disclosure, and effective management of grievances resulting from asset routine operations as well as any unplanned events;

- Provide compensation and benefits to affected communities as per applicable Reference Framework and ensure that economic status of the communities are enhanced by providing livelihood restoration opportunities;
- Maintain the identity, dignity, human rights, economies and cultures of Indigenous Peoples (IP), and for assets that trigger adverse impacts on IP, implement necessary safeguards for the affected Indigenous Peoples;
- Create awareness among employees, workers, contractors and sub-contractors about their roles and responsibilities to fulfil and sustain the E&S policy and of their accountabilities for complying with regulations, ESMS requirements and E&S procedures relating to their job performance;
- Allocate necessary resources to plan and implement effective training programs to create capacities and competencies within the asset organization;
- Establish key ESG performance indicators through adoption of ESG goals and objectives and ensure continuous improvement through performance evaluation across all operations;
- Drive effective implementation of the policy and management system by conducting timely audits and implementing corrective action measures
- Implement socially useful programs for welfare and sustainable development of the local community through targeted CSR initiatives; and
- Establish an information disclosure and reporting mechanism to apprise relevant environmental and social information to relevant stakeholders, and especially to the impacted community

The HSE manual provides a comprehensive insight into the company's E&S objectives, policies and procedures, some of which are:

- HSE policy
- Personal protective equipments
- Job safety analysis
- Behaviour based safety
- Legal compliance
- Driver safety
- Working at height
- Material handling and rigging
- Fire safety management, etc.

IndiGrid O&M team (includes asset manager and the engineers) and its contractors has the responsibility to use this manual in a way that serves its purposes.

2.3.2 HSE Legal Compliance Tracker

IndiGrid uses Legatrix for EHS regulatory compliance management. It is an IT-enabled legal support service software. The software provides quick dashboard for asset wise status of compliance requirements. Location wise status of compliance, department or function wise status of compliance, risk matrix of compliances and law wise status of compliances are available for review. Legatrix is enriched with interactive features with rich law content on categories of Assets, Corporate, Human Resource, Commercial, Environment-Health and Safety, Local, Regulatory, Taxation etc. "Compliance Alert" will be received in Legatrix system 11 days in advance to complete the compliance task. Escalation process will be automatically activated if compliance task is not completed within 03 days of assigning to the person or leader. Risk matrix defined for every compliance task and categorized as low/trifling, medium, high, critical and super critical depending on the consequence like penalty amount, imprisonment and closure of operations. Regulatory documents, compliance proof and supporting documents can be uploaded in the Legatrix system. All critical and super critical category document uploading is mandatory within 07 days. Non-compliance to documents upload within 07 days will be escalated as per escalation matrix. It was seen that asset managers have access to the Legatrix system where they can view the current active compliances to be fulfilled. IndiGrid has a well-qualified legal team at the corporate level that monitors the status of compliance through this system and follows up on actions needed to reach compliance as alerted by the system.

2.3.3 Status of EHS & Land Litigations Related to Assets

JTCL

As reported, there are 6 pending litigations with respect to JTCL's land. Out of these 1 is in the Supreme Court (filed in 2015), 3 in High court (filed 2014, 2018, and 2020), and 3 in Sessions court (filed in 2016). 2 out of 6 cases are understood to have been filed after acquisition of the asset in 2017. All cases are pertaining to compensation claims for construction stage damages and lack of intimation about land procurement under project.

OGPTCL

There are 3 pending litigations with respect to the land under this project. Two of these are filed against OGPTCL in 2017 and 2018; whereas it is a party to one litigation filed against the state of Chhattisgarh in 2018. In two of the cases petitioners have demanded for diversion of the transmission line from their land whereas in one case, the petitioner has claimed compensation for the right of way taken for the project. Two cases are pending at High court and one at District court. Secondary information shows another litigation against OGPTCL in Orissa High Court against construction of transmission line through forest area without obtaining consent from Gram Sabha. The matter is pending.

MTL, PKTCL and RTCL

As reported, there are no open claims or litigations with respect to project land and EHS aspects of these assets.

2.3.4 Emergency Preparedness and Response Plan (EPRP)

IndiGrid has developed an emergency preparedness plan. The EPRP addresses identification of areas where accidents and emergency situations may occur, communities and individuals which may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communications and periodic training to ensure effective response.

The type of emergencies which can arise and can impact the project related activities are as follows:

- Medical or rescue emergency in case of major accidents;
- Fire and/or explosion;
- Electrocutation;
- Trip and fall from height;
- Oil spill or chemical product release from vehicles and during maintenance;
- Severe weather response
- Bomb threat response
- Health Related Emergencies (food poisoning, injury, illness etc.)

As per ESMS, an onsite Emergency Response Team will be formed comprising of an Incident Commander, Emergency Coordinator, Assembly Point Coordinators and other support teams such as fire control, communications, first aid, etc. shall get activated in case of any emergency situation. The Site In-charge will be the Incident Commander under whom various coordinators will carry out the designated responsibilities till normalcy is restored. The Regional Head shall fully support the Emergency Response Team. Qualified/ experienced personnel (as applicable) will be identified/ designated for these roles considering their competency and managerial skills and maintain an up-to-date emergency management organization chart onsite along with their names and contact numbers.

The key E&S risks and issues associated with this project include: implementation of environment and social management system (ESMS) and staffing to undertake the project in accordance with IFC PSs; engagement with stakeholders and affected community during project operations, primarily related to health and safety of the landowners and users and access to the right of way; assurance of fair, safe and healthy working conditions for employees and contracted workers and consistent management of occupational health and safety (OHS); ongoing mitigation of any damage to land and assets under the towers and Right of Way, management of biodiversity issues at a few locations across all the lines with longer term monitoring; and culturally appropriate engagement with Indigenous communities wherever the lines pass through IP areas.

During the site visit it was observed that Line manager appointed by IndiGrid heads the emergency response team at asset level and is supported by project manager (IndiGrid), supervisor (O&M) and EHS officer (O&M). Site specific community health and safety plan is yet to be developed.

At asset level it was learnt that local government bodies have contact details of IndiGrid emergency contact team so as required community can directly communicate it to the patrolling team of IndiGrid or take the help of local government offices like District magistrate office.

2.3.5 Land Procurement

It is understood that IndiGrid shall acquire operational assets; therefore, it is not likely for the Company to get involved in land procurement of any form; unless required for substations³ (such as for BDTCL) under their scope, any storage areas, offices, labour camps etc. Therefore, the land related risks for the business are mainly limited to legacy issues with respect to litigations, claims for unpaid or partially paid compensation during land take and construction damages, pending consent related matters, recognition and settlement of rights of schedule tribes, forest dwellers, and those living in schedule V areas etc. Some O&M stage potential land related risks involve conflicts or legal disputes regarding pending or inadequate compensation for maintenance & repair stage damages, use of common properties such as village roads, community forests. At times litigations can lead to stakeholder issues on the ground like refusal to allow access to the ROW or occasional disagreements. This is a standard practice across all IndiGrid's assets, including those not being assessed as part of this ESDD.

The land take process for all the assets acquired by IndiGrid mainly occurs between the landowner and Sub-divisional Magistrate (SDM).

Key elements of the process under Electricity Act 2013, and Works of Licensee Rules 2006:

- i. Transmission Company to obtain individual consent from landowners by direct negotiation,
- ii. (a) If landowner is willing to give occupation of land, the Transmission Company can negotiate with the landowner regarding compensation and pay it directly;
(b) If landowner is not willing to give occupation of land to project, Transmission Company can approach District Collector (DC) or Commissioner of Police or any other officer authorised by the State Government for a written permission to proceed with the works,
 - a. The authority then sends a notice to landowner inviting a representative to receive compensation and complete formalities,
 - b. Upon receiving a representation from the landowner and making necessary inquires from relevant departments about market prices, the DC fixes a rate of compensation and sends it to the landowner for his confirmation,
 - c. If the landowner agrees with the amount, DC informs Transmission Company to deposit the same amount to the DC,
 - d. Once transferred, the same agreed is transferred (generally using a Demand Draft) by DC's office to landowner.
 - e. If the landowner does not agree with the proposed amount, he/she can file a litigation against the Transmission Company claiming higher compensation.

This process was followed across all assets for the land take by the developer, as reported. In some cases (assets), the land take was routed through aggregators. E.g. for the MTL asset, the developer engaged locals as agents to negotiate and facilitate the process of land take; whereas in case of OGPTL, M/s L&T was appointed as the facilitator of RoW procurement and compensation payment along with its main scope of construction. In these cases, the aggregators made payments to the landowners and got compensated themselves by the developer. As reported, the developer paid the aggregators only after reviewing the payments made to landowners.

The act specifies compensation towards loss and damages, referring to impact on either or both land and other assets. This needs to be understood in combination with Government Notification by Ministry of Power dated 15th

³ Presently, IndiGrid has 11 substations under its operations, across all its operational assets. These were acquired by the Company by transfer of land purchase and village level consent documents as reported.

October 2015⁴, whereby some states have ruled for land and damage compensation, while some have provisions only for damage compensation. The records of compensation payment shared for review, indicate that landowners affected by MTL line were paid compensated for both land and damages; whereas landowners affected by other 3 assets were compensated for construction stage damages only. Out of these 3, JTCL land take process was undertaken prior to the notification, therefore the provision of land compensation was not applicable to the project. For PKTCL asset, the records are not adequate to determine whether land compensation was paid. During consultations, the landowners could not confirm the difference between land and damage compensation they received. Since, there were no written agreements signed (payment made in demand draft), there is no documentary evidence to verify the same. With regards to RTL asset, the line passes through Madhya Pradesh, and Rajasthan, wherein state level notifications towards land compensation were not developed when land for project was being procured, therefore, provision of land compensation does not apply to the project.

Key elements of the process under Telegraph Act 1885:

- i. The telegraph authority⁵ has the power to place and maintain a transmission line on any immovable property, by means of taking only user rights of the land,
- ii. In case the property is in control or management of a local authority, the telegraph authority shall take permission from them before placing a line,
- iii. Once the line is placed, based on the damages incurred, the authority shall compensate interested persons.

The act primarily stipulates that only user rights over the land can be taken and that compensation against construction damages is to be paid. Construction stage damages across all 5 assets have been compensated for, as per this act.

The Company does not have any formal system in place to undertake land procurement or any safeguards to implement during asset acquisition. The ESMS suggests conducting Land Due Diligence as part of new asset risk assessment process. Presently, IndiGrid is yet to begin the practice of undertaking Land Due Diligences (LDDs) for new asset acquisitions.

The five shortlisted Transmission Line assets have been in operations for more than 4 years and Right of Way (RoW) for these assets were acquired by the developer between 2012- 2015. Right of Way for the lines as well as for the towers was procured through the Telegraph Act 1885 which allows for compensation for damages to crops and trees/structures and puts restriction on some activities like construction of structures or planting trees in the RoW. However, the Act only gives Right of Way access to the operator and the landowner/user can continue their agricultural, grazing, or other livelihood activities that are not restricted. While land was reportedly procured by the developer through negotiation with individual landowners, there is provision within the Telegraph Act for the District Administration to intervene if landowners do not agree to give RoW access. No resettlement or forced eviction has been reported. Economic impacts related to loss of crop or assets have been compensated according to provisions of the law. IndiGrid does not plan to acquire any additional land for these projects.

Compensation payment is complete for all lines except where there are pending litigations. While the legal liability to pay any additional compensation decided by the courts is contractually with the developer, IndiGrid will closely monitor these litigations as they can lead to stakeholder issues on the ground like refusal to allow access to the ROW or occasional disagreements. For legacy impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people).

The Grievance mechanism will be provided in the IndiGrid website with appropriate details and guidance, along as well as a phone number to use to register any grievances. Affected communities/stakeholders will be made aware of the grievance mechanism (access, function, etc.) through ongoing stakeholder engagement as well as information provided at each of the site office notice boards. IndiGrid will regularly monitor the status of all

⁴ https://www.mofpi.gov.in/sites/default/files/GUIDELINES_06.11.2015.pdf

⁵ Under sec 3(6) telegraph authority means the Director-General of [Posts and Telegraphs], and includes any officer empowered by him to perform all or any of the functions of the telegraph authority under this Act. And Under sec 3(2) telegraph officer means any person employed either permanently or temporarily in connection with a telegraph established, maintained or worked by [the Central Government] or by a person licensed under this Act.

grievances at an asset level and cumulatively at IndiGrid level. EHS and Social Manager as well as O & M contractor will be adequately trained on Grievance Management.

2.3.6 Stakeholders Engagement and Grievances Redressal

IndiGrid includes stakeholder engagement plan and grievance redressal mechanism in ESMS. IndiGrid will ensure an SEP and grievance mechanism are put in place at each asset and will be included in the O & M Contractor's responsibilities. The IndiGrid team at the SPV will review the implementation of these on a regular basis and ensure grievances are resolved according to the GRM process defined in the ESMS. The ESMS monitoring will also review the implementation of the SEP and GRM at each of the 5 assets.

Overview of Corporate level SEP and GRM

The flow chart representing stages of Stakeholder Engagement are given in the **Figure 2-4** below.

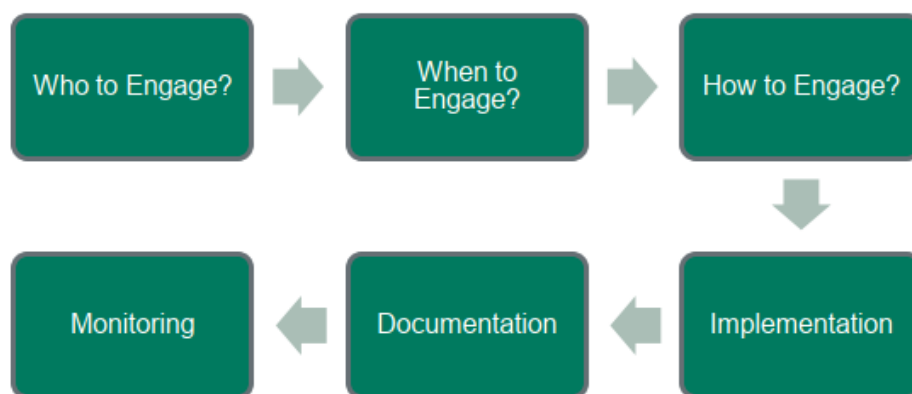


Figure 2-4: Stakeholder Engagement Process

For the purpose of identifying the stakeholders at an asset level, IndiGrid will follow the process as laid down below:

- Identify the geographical area to be covered in the SEP. This geographical area includes the transmission line corridor, solar power plant and villages impacted due to land acquisition and/or operations and maintenance activities;
- Once a detailed mapping of the footprint is completed, the potential issues and impacts from the project will be identified.
- In addition to project area, the overall area of influence should also be considered for identifying stakeholders.

Groups/ individuals that may be directly or indirectly impacted by the asset will be identified. These stakeholders will then be classified into various groups, such as:

- Project Affected Community;
- Contractors;
- Local, regional and national government institutions;
- Media;
- NGOs, civil society organizations (CSO);
- Other industries;
- Regulatory authorities;
- Suppliers

With respect to managing grievances related to environmental and social performance, Appendix K of ESMS describes the types of grievances, grievance redressal process and mechanism (informal and formal channels) for handling grievances arising from the various stakeholders of the asset.

If any internal or external stakeholder believes that IndiGrid's activities are having an impact on their quality of life, livelihood or environment, safety which they want the project team/management to address, such a concern can be classified as a complaint or grievances.

From the purpose of classifying the various kinds of grievances that can arise, they are mostly categorized as:

Internal Grievances

Employee Grievance (Separate procedure to be developed as part of the Human Resources Manual). These include the employees and workers hired specifically for the site operations.

External Grievances

- Contractor and labour related grievances;
- Community grievances on operations and maintenance of transmission lines, substations, and solar power plants;
- Community grievances on development, CSR intervention etc. related issues;

The IndiGrid Process flow chart is represented by the Figure 2-5 below.

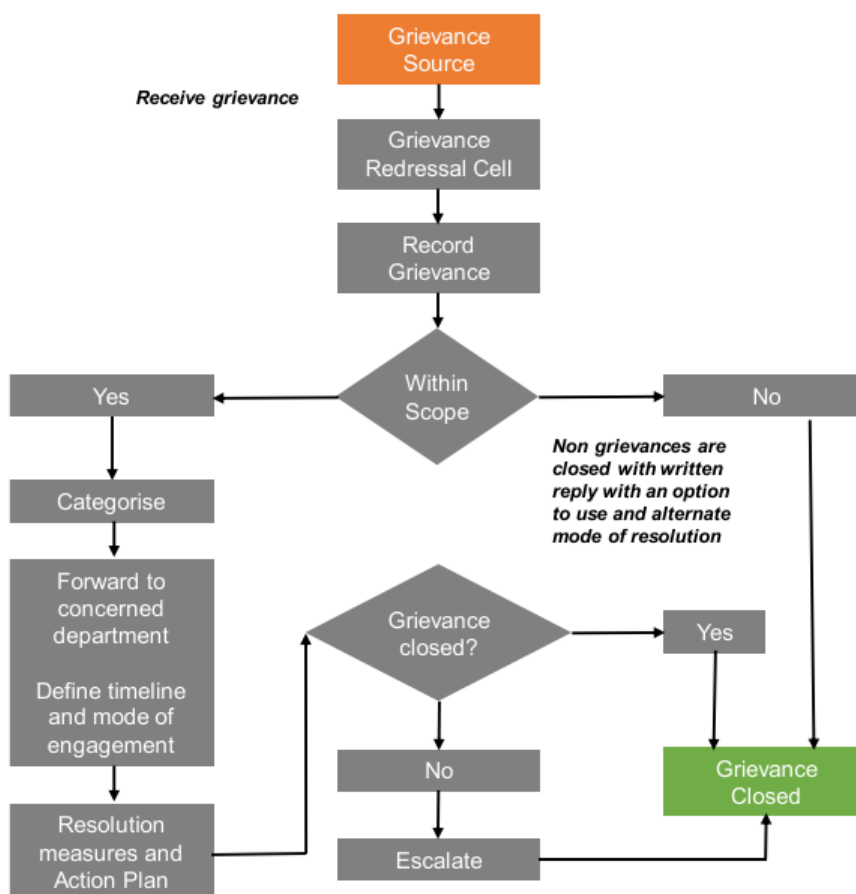


Figure 2-5: Grievance Redressal Process

Existing Practices

For understanding of the current practices, the grievances can be categorised into four main groups viz. (1) land/compensation related concerns, (2) workers/contractor related concerns, (3) government liasoning and grievances, and (4) general community's and any other external stakeholders' concerns.

For the first category, the government bodies at district level (generally the Sub-Divisional Officer, or Tahsildar working under the jurisdiction of a District Collector) have been given responsibility of receiving and addressing concerns of project affected land owners. The landowners are aware of this since they engage in communication with these officials at the time of compensation payment. In case of any support or clarification required from the project proponent (IndiGrid's asset team), the government officials approach them. Upon a formal intimation to intervene, IndiGrid's asset team then responds to the query or instruction by the government authority. In cases

when a concern escalates to a litigation in court, both government authorities as well as IndiGrid's legal team work in conjunction.

The workers report their concerns verbally to their direct Supervisors (appointed by the O & M) that are appointed for each Hub. In need of escalation, they reach out to the Site Engineer, or their Contractor (direct employer). These communications are not documented.

The Asset Manager and Site Engineers have the responsibility to liaison with relevant government bodies, that commonly across assets include the SDM, Tahsildar, Land Revenue Inspector etc. As understood, the intervals of communication are flexible and case to case basis. During a sample government official visit, to a SDM in Chattisgarh state, it was understood that after transfer of the previous SDM, there has been a gap in communication between the government and project proponent. As a result, some of the compensation related complaints have not been shared with IndiGrid.

For other general community and other external stakeholders, there are not formal or informal systems of engagement or grievance resolution in place. Reportedly, the maintenance workers who visit the line and towers for repair and oversight, are primary contacts between project and the community; however, as understood during site visits, the locals and workers do not interact with one another, regardless of concerns.

2.3.7 Information Disclosure

Information disclosure and consultation plan is mentioned in the ESMS which mentions that whenever necessary, IndiGrid will disclose required information to its stakeholders as part of its adherence to international standards. Some examples of information disclosure can be:

- Project completion milestones, updates on the project development status etc.;
- Key results/impacts/risks of the project as identified in the impact assessment and related studies;
- Key mitigation measures and systems that are to be put in place to minimize any adverse impacts;
- Proposed community interventions and engagement activities that are planned;
- Proposed changes in project design, schedule of events, potential activities associated with major maintenance, labour camp sites etc.; and
- Monitoring reports.

Figure 2-6 below marks the plan which IndiGrid uses for the purpose of information disclosure and response plan.

Stakeholder	Information to be disclosed	How information is to be disclosed	Proposed timeline for disclosure	Methods of Consultation and Engagement	Frequency of consultation	Venue	Proposed timeline for consultation
Information Disclosure				Consultation			
Land owners, Local Community							
Local Labourers and Sub contractors							
Vulnerable Community							
Political Parties							
Local NGOs							
Media							
Other Industries							

Figure 2-6: Information Disclosure and Response Plan

IndiGrid is yet to prepare an information disclosure plan.

IndiGrid disseminates key information of its business to public through its official website⁶. This information includes overview of its portfolio of assets, financial information for its investors, its management structure and team, annual reports, compliance reports among others. With respect to Company's commitment to Sustainability, IndiGrid discloses information on its Governance, CSR, and Environmental and Social performance⁷.

2.4 Project Appraisal and Categorisation

The ESMS has made provisions for Screening and Project Categorization. Each potential asset is required to be screened for various E&S risks including the certifications & permits, proximity from archaeological sites, major geological conditions in the project footprint, ecological sensitivities around the project, and likewise covered under the *Preliminary E&S Screening Checklist for Provisional Categorization*.

The Project is to be categorized as either A or B or C based on the outcomes of screening exercise. Furthermore, an ESDD is required to be undertaken. Though exact scope of the ESDD is to be determined based on the outcomes of the screening exercise, it is required to capture the following as per the ESMS:

- Asset overview,
- Review of E&S Risks against reference framework (*Applicable regulations, IFC PSs 2012, WBG General EHS Guidelines 2007, WBG EHS Guidelines on Electric Power and Transmission 2007*)
- Review of any previous studied conducted, including ESIA,
- Review of consents/permissions/licenses relevant for the project,
- Review of management systems to identify E&S risks, organizational capacity, reporting and monitoring requirements,

⁶ <https://www.indigrid.co.in/>

⁷ <https://www.indigrid.co.in/sustainability/our-initiatives/>

- Review of needs and practices of Stakeholder Engagement, Grievance Redressal, Emergency Response,
- Review of land aspects as per requirements given in PS 5,
- Review of contractor management processes and working and living conditions of workers,
- Review of publicly available information for any E&S issues,
- Confirmation on Project Categorization,
- Prepare an Environmental and Social Action Plan (ESAP) detailing corrective actions to be implemented by the Project along with timeframes of completion of such actions.

During consultations with EHS Head it was reported that during the asset transition phase, ESDD was done by other consultancy and risk analysis was done prior to acquisition. These documents were not available for AECOM's review. After the operation and maintenance phase has started, there is no change reported in any of the asset's categorization. But continuous evaluation of the assets is done, and the progress is discussed in the monthly meetings. As per the ESMS, the corrective actions in the ESAP are required to be understood in terms of Conditions Precedent (CP) and Conditions Subsequent (CS). CP actions being those needing implementation prior to investment and CS actions being those identified for subsequent implementation. The ESG Lead is given the responsibility to monitor progress against the ESAP actions.

Criteria for categorization

Provisional Categorisation	Description
Category A	Assets with potentially significant adverse environmental and social impacts that are sensitive, diverse, or unprecedented. A potential impact is considered sensitive if it may be irreversible (such as loss of a major natural habitat affect vulnerable groups or indigenous people, involve involuntary displacement and resettlement, or affect significant cultural heritage sites.
Category B	Assets with specific environmental and social impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures and international best practice. Potential adverse environmental impacts on human populations or environmentally important areas are less adverse than those of Category A assets.
Category C	Assets with business activities with minimal or no adverse environmental and social impacts.

Note: Assignment of one among the provisional categorisation above will be influenced by the asset's lifecycle and the specific context. Legacy or residual E&S impacts and cumulative implications of the asset will also be considered during the ESDD to confirm the project categorisation.

Source: IndiGrid's Corporate ESMS .

2.5 Monitoring and Measurement of Performance

As per ESMS, IndiGrid's performance evaluation and review program shall be overseen by the ESG Lead at the Corporate Office. The purpose of this program shall be:

- To track performance and its compliance against the established benchmarks or requirements in the ESMS;
- To record information in order to track performance and establish relevant operational controls;
- To establish key quantitative and qualitative environment, health and safety and social indicators;
- To set quantitative EHS goals, objectives and targets;
- To verify progress towards the desired outcomes; and
- To reflect the necessary corrective and preventive actions in the ESMS.

At an asset level, monthly progress report is prepared by the EHS officer and submitted to the Asset manager which is then reviewed by the higher management at the Corporate level.

2.5.1 Safety Audits and Compliances

The overall monitoring responsibility of asset's E&S performance lies with the Regional Head. The Regional Head undertakes monitoring of routine O&M activities as well as activities being undertaken by contractors as per the Internal Audit Checklist. The Regional EHS Head undertakes periodic visits (as and when required) to work areas at the time of internal audits.

An audit and monitoring schedule is developed for each asset by the Regional EHS Head and shared with the ESG Lead, who will be responsible for further communication of the schedule to respective departments and organize the audits. The findings of the audit will be shared with the ESMS Committee in form of Internal Audit Report, including a time bound corrective action plan to be implemented at asset level for addressing non-conformances. Internal audit checklist is included as an Appendix of IndiGrid 's ESMS manual. During consultations with asset managers, it was noted that HSE audit checklist / office inspection is prepared monthly which covers aspects like – clearance of roads/walkaway /passages kept clear, proper ventilation, provision of dustbins/ garbage bins and hub inspections (whether the gas cylinder, hose pipe & regulator are safe, sufficient space, ventilation arrangements, etc.)

2.6 Resource & Waste Management

Solid waste generation during operation and maintenance activities includes domestic, hazardous and demolition waste, or general solid waste from rest areas, vegetation waste from right-of-way maintenance. Paint waste can also be generated from TL tower and line maintenance (e.g., due to removal of old paint), damaged or waste electrical transmission wires.

There is no requirement of water for maintenance activities. For drinking purposes at site office and worker's accommodation, packaged drinking water is sourced from local water vendors and domestic wastewater generated is discharged into municipal public sewage systems.

Hazardous wastes generated include spent transformer oil, used oil, dielectric containing equipment, batteries, and gaskets/other maintenance wastes. IndiGrid has developed an SOP on Procedure for Waste Management, providing guidance for disposal of the various kind of non-hazardous waste generated at all operating sites. The SOP also provides details on management of hazardous wastes including lead acid battery, e-waste, and biomedical waste. IndiGrid will implement procedures to store all hazardous materials and wastes in designated areas with adequate secondary containment and dispose hazardous wastes through authorized entities in accordance with host country requirements.

2.7 Corporate Social Responsibility (CSR)

IndiGrid has a CSR Policy at Corporate level and a Guidance Note prepared in conjunction with the CSR Policy, and is applicable at Corporate as well as asset levels. IndiGrid has a separate CSR committee of designated personnel for proposing and approving projects and the process for proposal to implementation of the CSR projects. The funds for the proposed CSR initiatives can be allocated from the voluntary and statutory CSR budget available in certain IndiGrid group entities in line with the scope and parameters set in Companies Act, 2013.

Plan for Financial year 2022 includes planting equal number of trees as has been felled down across the portfolio in the due course of time as IndiGrid adheres to all technical and statutory requirements needing to cut down as many trees, we also are aware of our responsibilities towards nature. Planting the trees shall remain the core of IndiGrid and its subsidiary's focus area under its Corporate and Social Responsibility and shall be a continuous project under CSR initiative.

While green initiative remains the core area, there is a provision to undertake additional CSR measures in the following areas as per the domestic requirement of projects entities :

1. Promoting education
2. Promoting healthcare including preventive healthcare
3. Rural development projects
4. Promotion of national heritage, art & culture
5. Green Initiative

The designated employees (Proposer) shall submit the proposal to CSR Management Committee representative for events/activities planned under their geographical jurisdiction duly approved by the functional head.

The proposal once approved by CSR Management Committee shall be sent to Finance and SCM for fund allocation and processing of Work Order if required. After completion of the respective activity the Proposer shall

submit final completion report to CSR Management Committee. Also wherever applicable Proposer shall collect certificate/letter from respective authority mentioning the satisfaction towards work done by IndiGrid.

CSR Management Committee –

1. Mr. Harsh Shah - CEO
2. Mr. Jyoti Kumar Agarwal - CFO
3. Mr. Satish Talmale – COO
4. Mr. Swapnil Patil – CS

CSR Committee Representative –

1. Saurabh Singh

Proposer –

1. Mr. Sunil Jadhav – Northern Region (Transmission Line)
2. Mr. Ashwini Sharma – North-East Region (Transmission Line)
3. Mr. Najmal Khan – Western Region (Transmission Line)
4. Mr. Prakash Jena – East and South Region (Transmission Line)
5. Mr. Suman Sah – All Regions (Substation)
6. Mr. Amit Kumar Singh – PKTCL.

IndiGrid has a CSR Policy and a Guidance note prepared to help implement the policy. IndiGrid recognizes its business activities resulting in cutting and trimming of trees. As part of its CSR, IndiGrid pledges to plant equal number of trees. Green Initiative (including tree plantation and other interventions) remains at the core of IndiGrid's CSR programs.

While Company has also chosen other focus areas of work, that will allow them to bring social development in and around their assets. These focus areas include, Promoting Education, Promoting Healthcare, Promoting Natural Heritage, Art, and Culture, and Rural Development. Some of the programs implemented by IndiGrid include, providing infrastructure to schools, making of a rain shelter, installation of solar street lights, skill development program for women belonging to ST community etc. as reported.

The budget allocation is approved by CSR Management Committee at Corporate level. It is initiated as a proposal by the Regional level person responsible for CSR. Once approved by CSR Management Committee, the proposal is sent to Finance and SCM departments for fund allocation and processing. For the last three Financial Years 2019-2020, 2020-21, and 2021-22 IndiGrid's total CSR budget was INR 2.96 crores, INR 3.62 crores, and INR 2.67 crores, respectively. Its percentage out of the total net profit of the Company is not known, as financial information shared with AECOM is in PBT.

Moreover, it could not be confirmed if the entire funds allocated per year were spent on CSR activities. Therefore, IndiGrid's compliance with section 135(1) of the Companies Act 2013 can not be assessed.

CSR activities at asset level are yet to pick pace. For example, at RTCL, JTCL, and MTL CSR implementation is yet to begin. At PKTCL, IndiGrid has engaged in tree plantation at many sections in the corridor; whereas at OGPTL, IndiGrid has distributed bags and stationary kits to students of primary school, installed water purifier at a government hospital, and installed air conditioner at a police station.

2.8 Human Resources and Contractor Management

IndiGrid has put in place Human Resource Policies that cover elements of leaves, grievances, anti-sexual harassment among other. These are applicable to all its employees from executives to staff and both office level and site level employees. Employee policy manual is present on the online portal name ZOHO people.

The process of recruitment at IndiGrid is undertaken by the HR Department. Courses on POSH, Code of Conduct and Information Security needs to be completed by all employees through the online e-learning module within

one month of joining the company. A survey at the end of the orientation program is conducted to understand new joiners' satisfaction levels of their experience of first 2-3 weeks. Different leaves (sick leave, relocation leave, maternity leave etc.) and attendance policy are also included

Talent review process is conducted once an year which is conducted by HODs who may consult or do reviews with line manager also. HODs present the outcome in MCM setup for views of other HODs. All employees to be placed in 9 box matrix and individual development plan (IDP) is created.

"Sexual Harassment" includes any unwelcome, sexually determined behaviour, direct or by implication, and includes any physical contact and advances, a demand or request for sexual favours, making sexually coloured and unsavoury remarks, showing pornography, any other unwelcome physical (for example, touching or brushing against any part of the body and the like, etc.), verbal or non-verbal conduct having sexual overtones. There is an internal complaints committee which sits at their Mumbai and Delhi office.

IndiGrid is governed by a Code of Ethical Business Conduct, which defines the nature of professional relationships between co-workers, competitors, customers etc. It covers elements of Whistle Blower, anti-discrimination, social media communication, anti-corruption as well. IndiGrid has prepared an Employee Policy Manual that is broadly aligned with PS2 and consists of policies and procedures covering employee related aspects including induction to the job, attendance and leave, transfers, relocations and exit, loan and advances, medical insurance, compensation, among other employee benefits. The manual also consists of guidelines on prevention of sexual harassment (PoSH) in the workplace and has an Internal Complaints Committee (ICC) to handle concerns under this policy. For sexual harassment related violations, employees can approach an Internal Committee. There is an awareness training arranged for all its employees and staff every year on the PoSH Policy. As reported by corporate level employees as well as asset level teams, there has not been a complaint under this system till date. There is no specific reference in the current SH guidelines on addressing gender-based violence (GBV) at the corporate as well as asset level. For sexual harassment related violations, employees can write to the Internal Committee, at posh.siml@indigrid.com.

2.9 Climate study

Transmission lines, which are used for the transmission of electrical power to various distribution units, are usually vulnerable to extreme weather events like cyclones. The company chose to partner with ClimaCell's⁸. This software provides information on precipitation, depression, etc. using passive satellite remote sensing data. This software assisted the company in analysing the historical data to determine the recent changes in climatic conditions compared to wind zones. Such analysis enabled the company to proactively work on tower monitoring and strengthening measures to help determine a robust risk mitigation plan during the Amphan Cyclone.

As per the information available in IndiGrid generated 168,024 kWh units (YTD Mar-21) from our rooftop solar power plant at Bhopal and Dhule substation used for auxiliary consumption resulting in CO₂ avoidance of total 138.17 tonnes⁹.

Green House Gas (GHG) emissions assessment was conducted for IndiGrid portfolio that consists of 14 transmission lines and 2 solar power projects. A detailed calculation for Scope 1 and Scope 2 GHG emissions was conducted along with a comparative analysis for the same. During the time period of April to September 2022, Dipalpur and Kadarapur showing higher value of scope 1 emission due to higher amount of SF₆ release in the atmosphere.

As per the estimation of the emission of Scope 1 and 2 GHG, it has been understood that SF₆ is the driving force behind the higher value of scope 1 emissions for IndiGrid. Therefore, some preventive measures have been suggested to reduce SF₆ loss from the substations

⁸ <https://analyticsindiamag.com/how-this-mumbai-based-transmission-company-managed-power-during-amphan-with-ai-powered-weather-intelligence-platform/>

⁹ <https://www.indigrid.co.in/sustainability/our-initiatives/>

EPA recommendation on SF₆ reduction

- Dedicated standard operation procedure for SF₆, which focuses on inventorization of SF₆, detection of leaks, recover SF₆ from circuit breakers and recycle of SF₆;
- Training for the employees, who are associated with SF₆ handling;
- Implementation of Gas cart operation and maintenance system during off-loading and transferring SF₆ for maintenance and recycling;
- It is to be ensured that during maintenance and disposal of equipment (switch gears, circuit breakers) SF₆ must be recovered to correct blank off pressure;
- Implementation of leak detection and repair system;
- Use of alternatives for SF₆, such as CO₂ based switchgear, wherever feasible;
- Initiatives on SF₆ reduction by Companies;

2.10 Secondary Data search

Investor grievance redressal mechanism

IndiGrid has Investor grievance redressal mechanism through which an investors can lodge a complaint for non-receipt of any right available to them or failure of the Registrar & Transfer Agents (RTA)/IndiGrid to comply with any statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the RTA. In case of non-satisfactory response from RTA, investors can also lodge their complaints through the IndiGrid's designated email id for investor grievances – complianceofficer@indigrid.co.in or investorrelations@indigrid.co.in. The designated email ids are also displayed on the IndiGrid's website. Alternatively, investors can send their complaints at the principal place of business of the IndiGrid. Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.¹⁰

Guidance note on whistle-blower policy

IndiGrid has whistle-blower policy which has a Steering Committee. The committee aims to protect the confidentiality and anonymity of the Whistle Blower to the greatest extent possible while conducting an inquiry into the complaint. In specific cases where disclosure is mandated under law or if the criticality and necessity of disclosing the identity of the Whistle Blower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the Whistle Blower.¹¹ IndiGrid has prepared an Employee Policy Manual that is broadly aligned with PS 2 and consists of policies and procedures covering employee related aspects like Whistle Blower, anti-discrimination, social media communication, anti-corruption including induction to the job, attendance and leave, transfers, relocations and exit, loan and advances, medical insurance, compensation, among other employee benefits. As per the ethical business code of conduct, Email Id's of the officials to be contacted was mentioned. As reported by corporate level employees as well as asset level teams, there has not been a complaint under this system till date.

All employees have access to an online portal named Zoho People. Any queries with respect to the policies or their employment conditions can be posted on Human Resources helpdesk on this portal.

Sarna Land

Sacred groves called 'Sarna' (derived from Saran Dharam) is located in the Bihar-Jharkhand-West Bengal region, where one of transmission lines, Purulia-Kharagpur Transmission (PKTCL) Project was constructed. Sterlite Power who constructed the transmission adopted a two-pronged approach of modifying the line construction plan and simultaneously working with the religious leader to manage the minimal unavoidable felling of trees. Out of respect for the community's beliefs, the project's route underwent a deviation¹².

Media Article related to Wildlife

The media articles available in the public domain are presented here however asset specific assessment are included in their respective sections.

¹⁰ https://www.indigrid.co.in/wp-content/uploads/2021/12/Investor_Grievance_Redressal_Policy.pdf

¹¹ https://www.indigrid.co.in/wp-content/uploads/2021/12/Guidance_Note_on_Whistle_Blower_Policy.pdf

¹² <https://www.sterlitepower.com/community/religious-beliefs-and-biodiversity-conservation-sterlite-power-case-study>

Some media articles related to transmission line and wildlife interactions are provided below:

- Around 1,300 wild animals had been electrocuted across India due to deliberate and accidental electrocution between 2010 and 2020, reveals a data compiled by NGO Wildlife Protection Society of India (WPSI). The numbers included over 500 elephants, 220 flamingos, 150 leopards and 46 tigers among other animals across the country. Overall, 74 wild animals had been killed by electrocution in Maharashtra (2010-2020). States such as Odisha, Kerala, Karnataka, Andhra Pradesh, Assam, Tamil Nadu, Chhattisgarh, Jharkhand, Uttar Pradesh, and Uttarakhand had all witnessed high animal electrocution deaths over the past decade. In October 2016, the Union environment ministry issued guidelines detailing safe practices to avoid animal deaths due to electrocution by power transmission lines directing electricity distribution companies to preferably use air bunching of cables (ABC) - overhead ones or use underground cables as much as possible¹³.
- Since 2009, around 50 elephants are killed by electrocution, annually. In 2015-16 and 2017-18, 178 elephants were killed by electrocution, across the country. And electrocution, along with poaching, was responsible for 31.5 percent (207) of the 656 tiger deaths between 2012 and 2018, as per the data of the National Tiger Conservation Authority. To prevent the death of elephants and other wildlife from electrocution, NBWL, the expert wildlife panel of India's environment ministry, has called for developing a nationwide strategy for long-term planning of electricity grid networks. The panel recommended measures like burying transmission lines underground, setting up reinforced electric poles fitted with spikes to prevent elephants from rubbing against them, lifting sagging overhead power lines, and dismantling of defunct solar-powered fences to protect the animals from coming into contact with these potential sources of electrocution¹⁴.
- Data from Delhi-based NGO Wildlife Protection Society of India (WPSI) show 355 elephants across the country died from deliberate and accidental electrocution between 2010 and 2016. The maximum electrocution cases in India of animals such as elephants, tigers, lions, sloth bear, deer and bird species, were seen in Karnataka, Andhra Pradesh, Assam, Tamil Nadu, Chhattisgarh, Jharkhand, Kerala, Odisha, Uttar Pradesh and Uttarakhand, WPSI found¹⁵.
- There are provisions under the Electricity Act to book people for unauthorized power use but not for misuse of power transmission lines to enable electrocution of tigers¹⁶. Large animals, like elephants, are more likely to come into contact with high-voltage overhead power lines passing through forests and get electrocuted¹⁷.
- Unnatural elephant deaths in the country are mainly because of the largest forest animal coming into contact with high-tension lines drawn through sanctuaries and forests¹⁸.
- Per the latest directives, powerlines in forests should either be underground or enclosed in insulating cables hoisted above the height of an elephant's trunk. It also states that local power supply units should maintain these cables¹⁹.
- According to Environment Ministry data, a total of 655 elephants were killed between 2009-10 and 2016-17 — taking the average pachyderm deaths to about seven every month and one every four days. Of these, 390 deaths occurred due to electrocution. A herd of 13 elephants was passing through a village in Sadar Forest Range. Seven of them came into contact with a sagging wire and were electrocuted²⁰.
- On the night of 4 September, a large tusker was electrocuted by a sagging high tension electric cable in Kaziranga national park, Assam. In many parts of elephant country, electric lines don't conform to the standard 6 metre (20 feet) height from the ground set by the Indian Electricity Rules. The Elephant Task

¹³ <https://www.hindustantimes.com/mumbai-news/1-300-wild-animals-killed-by-electrocution-in-india-over-a-decade-report/story-zK5yrodyMJyxhMtNhjmtFI.html>

¹⁴ <https://india.mongabay.com/2019/09/save-elephants-and-wildlife-from-power-lines-says-environment-ministrys-panel/>

¹⁵ <https://www.hindustantimes.com/mumbai-news/india-s-death-fields-more-animals-electrocuted/story-JcECsLsullRkQHO9STIF3K.html>

¹⁶ <https://timesofindia.indiatimes.com/city/nagpur/power-lines-in-corridors-big-threat-to-dispersing-tigers/articleshow/58465647.cms>

¹⁷ <https://timesofindia.indiatimes.com/city/kochi/in-six-years-474-elephants-electrocuted-in-india-moef/articleshow/85607875.cms>

¹⁸ <https://timesofindia.indiatimes.com/india/sc-seeks-response-from-centre-17-states-on-741-elephant-electrocution-between-2009-2020/articleshow/88724186.cms>

¹⁹ <https://thewire.in/environment/poorly-maintained-high-power-lines-are-killing-elephants-in-odisha>

²⁰ <https://theprint.in/india/governance/electrocution-rail-accidents-encroachment-why-elephants-keep-dying-in-india/141869/>

Force, headed by environmental historian and scholar Mahesh Rangarajan, submitted its report to the ministry five years ago. It recommended the height of power lines be increased, bare wires be converted to insulated cables, and the power companies be held responsible for inaction. In Periyar Tiger Reserve, Kerala, power companies buried approximately 5 km of 11kV power line that was in the way of elephants. Similarly, in Kutch, Gujarat, after 400 flamingos hit overhead electric cables in 2011, the lines were laid underground for an 8-km stretch. Instead of burying the cables in Cauvery Wildlife Sanctuary, the state power distribution company strung an insulated cable for over 20 km up to MM Hills²¹.

- A wild adult elephant was electrocuted as it came into contact with a 11,000 volt wire dangling precariously eight foot above the ground from a bent pole in the Dumduma Forest Range in Assam, north eastern India²².

²¹ <https://www.theguardian.com/environment/india-untamed/2015/sep/15/elephants-electrocuted-by-sagging-power-lines>

²² <https://www.dailymail.co.uk/news/article-2607285/Heartbreaking-images-elephant-died-ELECTROCUTED-11-000-volt-wire.html>

3. Overview of Sites Selected for ESDD

A total of 6 transmission line assets were covered for desktop E&S screening exercise as follows:

1. Jabalpur Transmission Company Limited (JTCL)
2. Maheshwaram Transmission Limited (MTL)
3. Purulia & Kharagpur Transmission Company Limited (PKTCL)
4. RAPP Transmission Company Limited (RTCL)
5. Odisha Generation Phase – II Transmission Limited (OGPTL)
6. Bhopal Dhule transmission Company Limited (BDTCL)

Out of these 6 assets five assets following 5 assets were shortlisted by IndiGrid for ESDD, based on desktop based E&S screening:

1. Jabalpur Transmission Company Limited (JTCL)
2. Maheshwaram Transmission Limited (MTL)
3. Purulia & Kharagpur Transmission Company Limited (PKTCL)
4. RAPP Transmission Company Limited (RTCL)
5. Odisha Generation Phase – II Transmission Limited (OGPTL)

The details on key E&S screening aspects and outcome of assessment is provided in Appendix F. The E&S screening aspects identified / ranked in desktop screening assessment were further studied in ESDD assessment for selected sites.

3.1 Jabalpur Transmission Company Limited (JTCL)

JTCL is 765 kV Double Circuit and 765 kV Single Circuit transmission lines to have been established (~995 ckms of transmission lines covering two elements). It is a part of the system strengthening common for the Western Region and the Northern Region – mainly between the states of Chhattisgarh and Madhya Pradesh. The corridors thus created are crucial links, based on which the Central Transmission Utility has entered long-term open access agreements with several generation companies in the Eastern region.

JTCL operates two EHV overhead transmission lines of approximately 992 ckms in the states of Chhattisgarh and Madhya Pradesh comprising one 765 kV double circuit line of approximately 757 ckms from Dharamjaigarh (Chhattisgarh) to Jabalpur (Madhya Pradesh) and one 765 kV single circuit line of approximately 235 ckms from Jabalpur to Bina in Madhya Pradesh.

IndiGrid acquired JTCL from Sterlite Sponsor in May 2017 and currently 100% ownership is with IndiGrid.

The details on JTCL's transmission lines and substations are provided in **Table 3-1** below.

Table 3-1: JTCL's Transmission Lines

Sr. No.	Transmission Line / Substation	Route Length (ckms)	Specifications	Commission Date
1.	Jabalpur-Dharam Jaigarh	759	765 kV D/C Transmission Line	September 14, 2015
2.	Jabalpur - Bina	235	765 kV S/C Transmission Line	July 1, 2015

Source: <https://www.indigrid.co.in/portfolio-assets/jabalpur-transmission-company-limited-jtcl/>

The geographical spread of the Transmission Lines is as illustrated in Figure 3-1 and Figure 3-2.

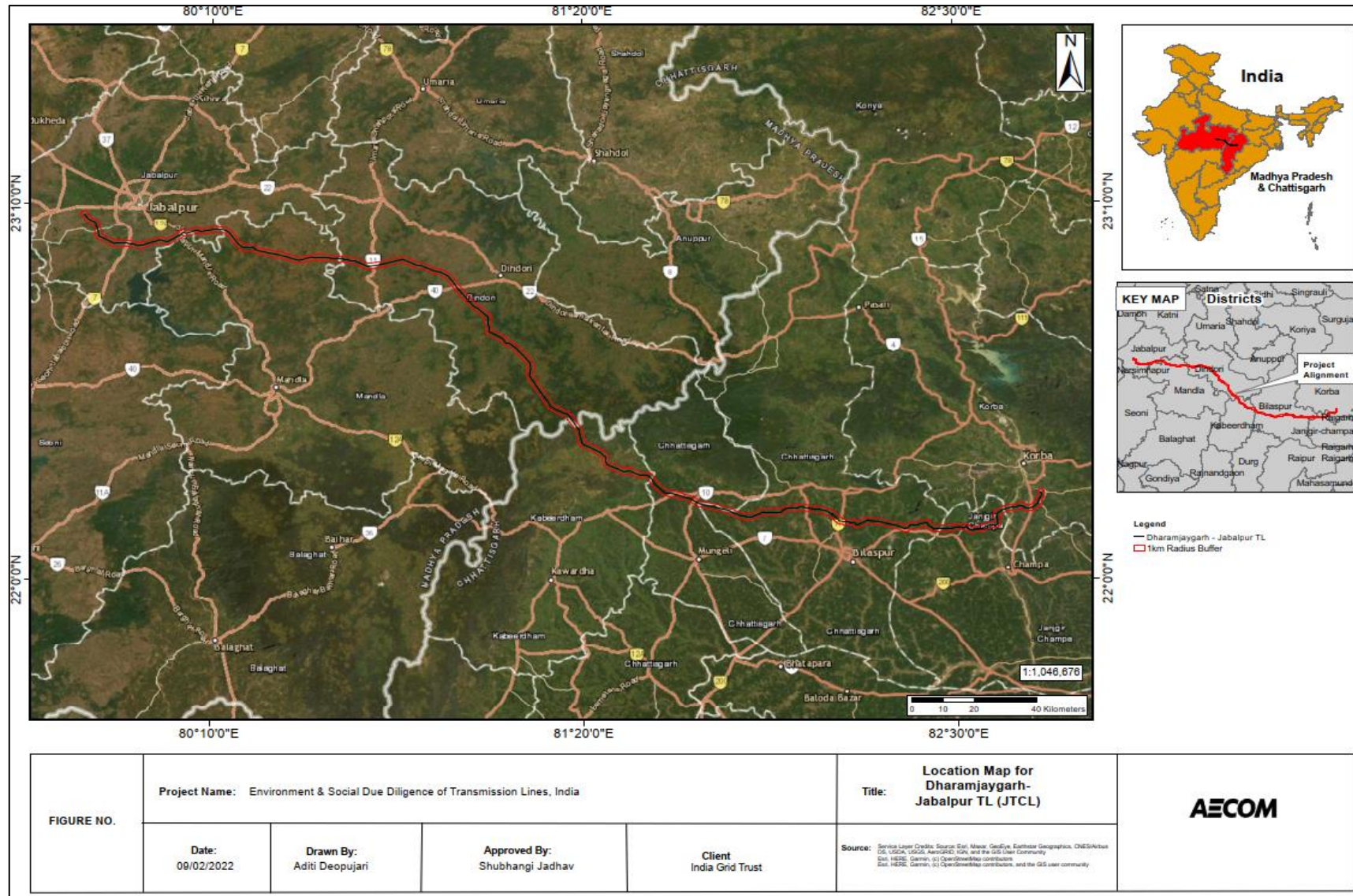


Figure 3-1: JTCL Transmission Line (Dhamarajygarh - Jabalpur)

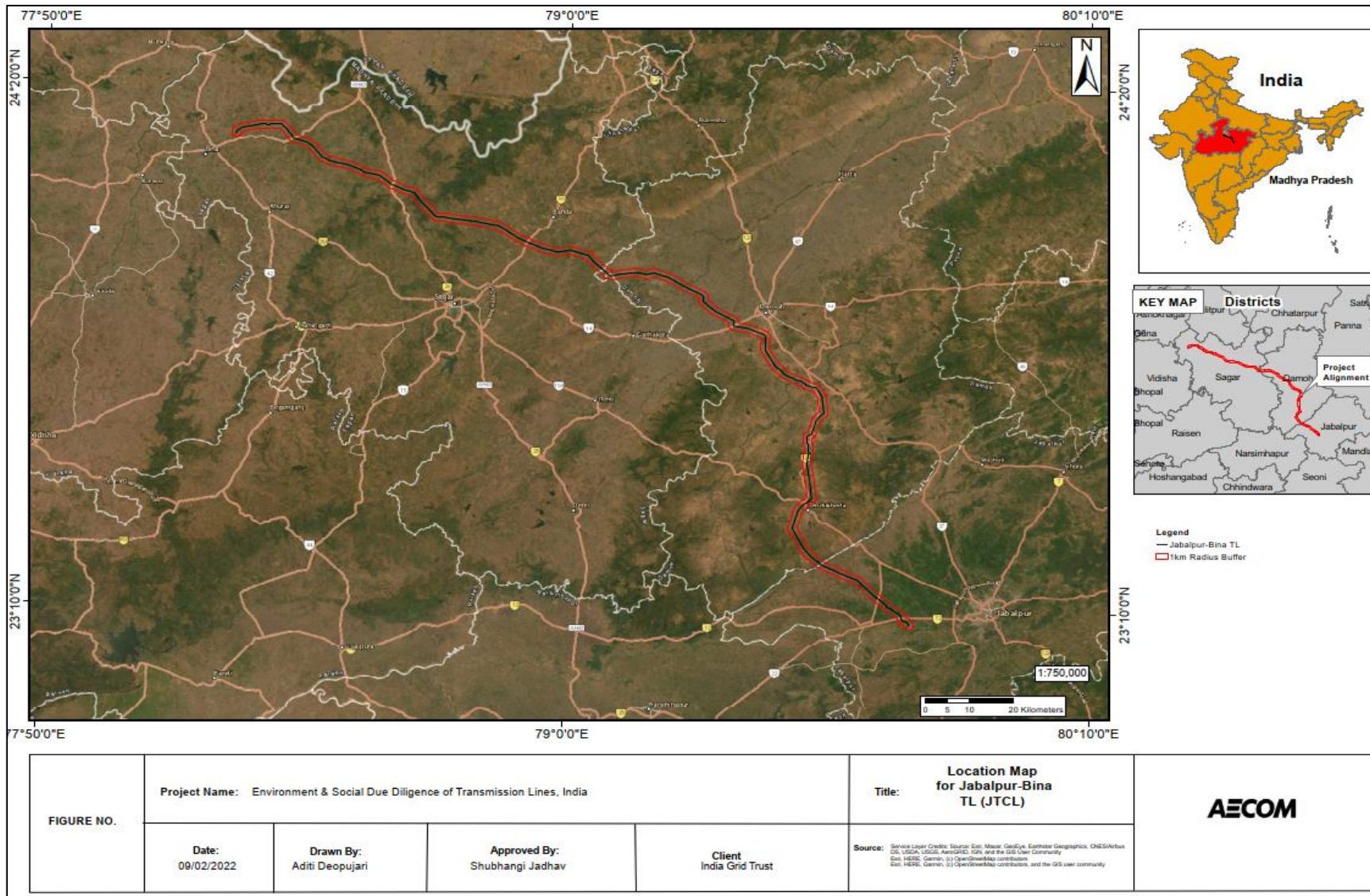


Figure 3-2: JTCL Transmission Line (Jabalpur - Bina)

3.1.1 Project Details

JTCL is 765 kV Double Circuit and 765 kV Single Circuit transmission lines to have been established (~995 ckms of transmission lines covering two elements). JTCL operates two EHV overhead transmission lines of approximately 992 ckms in the states of Chhattisgarh and Madhya Pradesh comprising one 765 kV double circuit line of approximately 757 ckms from Dharamjaigarh (Chhattisgarh) to Jabalpur (Madhya Pradesh) and one 765 kV single circuit line of approximately 235 ckms from Jabalpur to Bina in Madhya Pradesh. JTCL covers in total 535.81 ha. of forest area which is spread across two states Madhya Pradesh (422.128 ha) and Chhattisgarh (113.678 ha).

The site is under the operation phase and was commissioned on the 14th of September 2015. The asset was acquired after the construction was completed. Initially IndiGrid had appointed JBS Enterprise Pvt. Ltd. for the maintenance which was later replaced by Telegance Powercomm Pvt. Ltd. who is currently O & M of project. As per the consultation with IndiGrid site representatives, regular maintenance work is carried out round the year which includes trimming of bushes if they fall in the clear height of the transmission lines being one of the many activities performed during patrolling. Precautions like using safety helmet, safety belt while working at height were taken. However, as reported there is no usage of tower cranes during O&M work.

Organisation Structure

The project operations are managed by the Line In charge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to Line In charge as well as the Supervisor of O & M contractor. The site level organisation structure of JTCL is provided in the Figure 2 below.

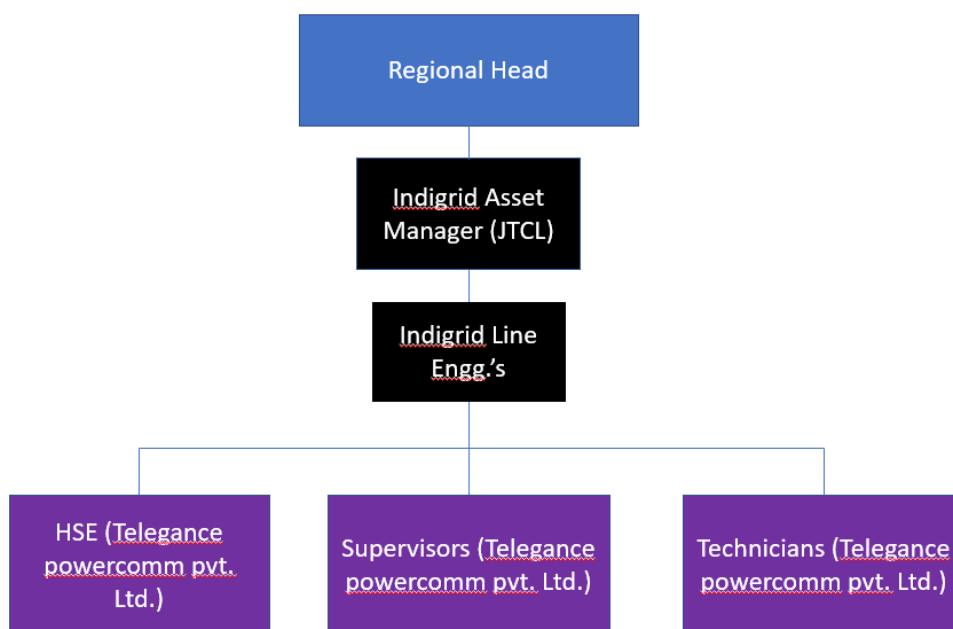


Figure 3-3: Site Level organization structure of JTCL

Resource Requirements:

Land Requirement

JTCL has two transmission lines of 765kV each, passing through 294 villages across 10 districts in two states Madhya Pradesh and Chhattisgarh. The combined corridor of the project admeasures 4039.88ha of land out of which 70% of corridor passing through private land and the remaining through forest land. The Right of Way for the tower base area and high voltage line was obtained under the Electricity Act 2003 and Indian Telegraph Act 1885.

There is lack of information in terms of when was the land procured; however, compensation for damages during construction was paid between 2012 and 2013; therefore, indicating that the Right of Way was obtained before 2012. The procurement of land was undertaken by the asset developer.

The transmission lines are directly connected to the Government Grid stations, therefore, there are no project operated substations for this project. IndiGrid reported that no additional land was procured for access roads. The existing roads are being used to access the line and towers.

Workforce Requirement

IndiGrid has appointed 1 O & M contractors to carry out operations and maintenance activities across the transmission lines. The contractor has engaged 58 workers for the project work. Reportedly and as observed during site visit there are no female workers engaged for this project.

The IndiGrid team comprises of the Asset Manager/line manager, 2 Engineers working on one line each and reporting to the Asset Manager. There are total 5 engineering hubs across the asset are made by the contractor. The patrolling activities are controlled from these hubs.

Water Requirement

There is no need for water requirement for the transmission lines as recorded during the site visit. For day-to-day water requirements at hubs where the employees stay, they use canned mineral water (available at different quantity as per their need) for drinking purpose and boring water available in the society for bathing and daily needs.

Drainage

Drainage provision is not required for Transmission lines.

Waste Management

The only waste generated at the asset level is where the employees and workers of contractor side stay. These are mainly the kitchen waste and usual home wastes which are collected by the municipality service provided in the location.

Schedule V Areas

In JTCL, the Transmission line has 80 km passing through Scheduled V area, intersecting with 86 villages and 3 districts and potentially impacting communities from the Gond and Dhoba tribes.

Status of Pending Litigations

There are 6 pending litigations related to land for JTCL project. Out of these 1 is in the Supreme Court (filed in 2015), 3 in High court (filed 2014, 2018, and 2020), and 3 in Sessions court (filed in 2016). 2 out of 6 cases were filed after acquisition of the asset by IndiGrid. All cases are pertaining to compensation claims for construction stage damages and lack of intimation about land procurement under project.

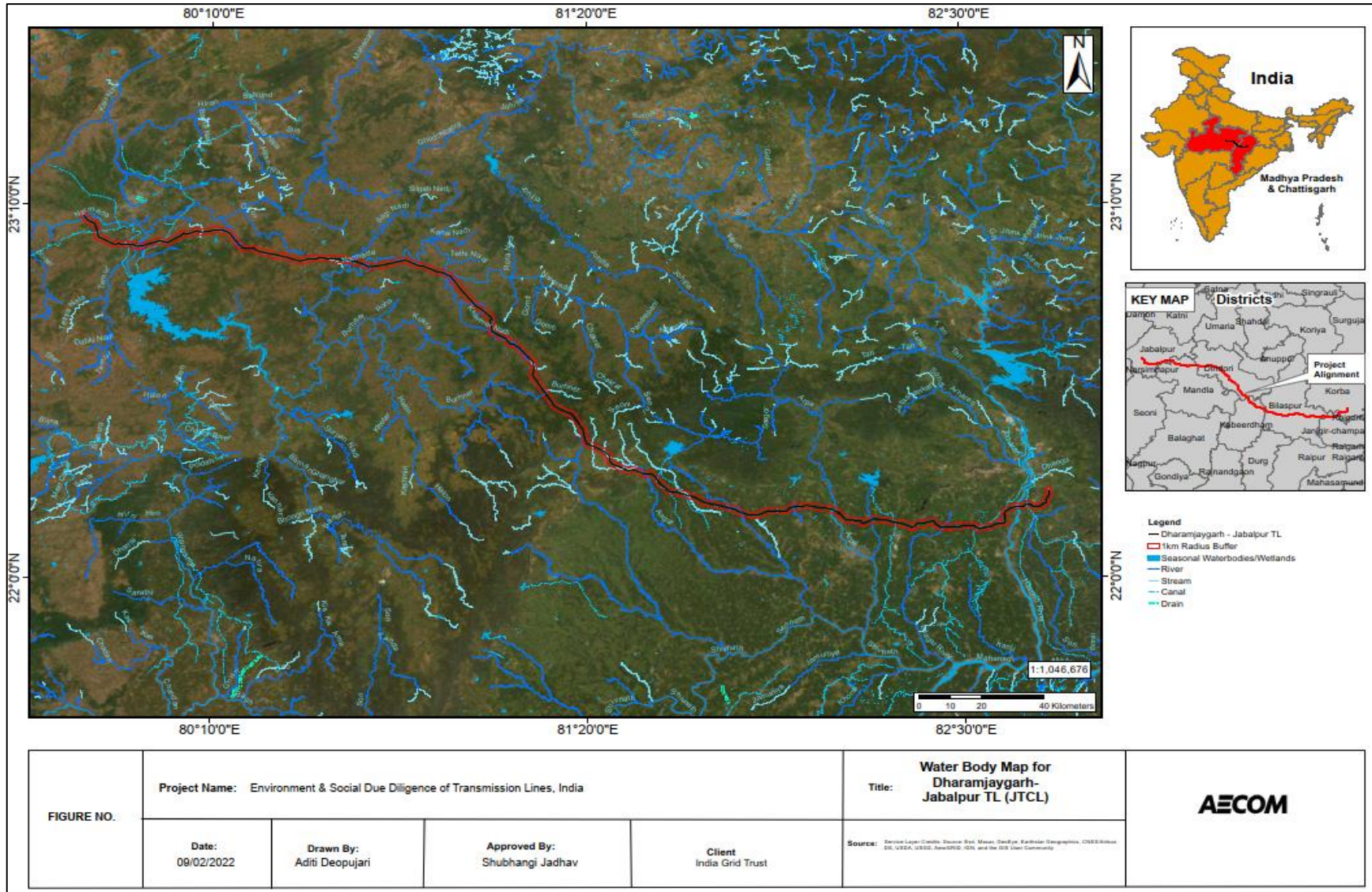


Figure 3-4: Waterbody Map for JTCL (Dharamjaygarh – Jabalpur)

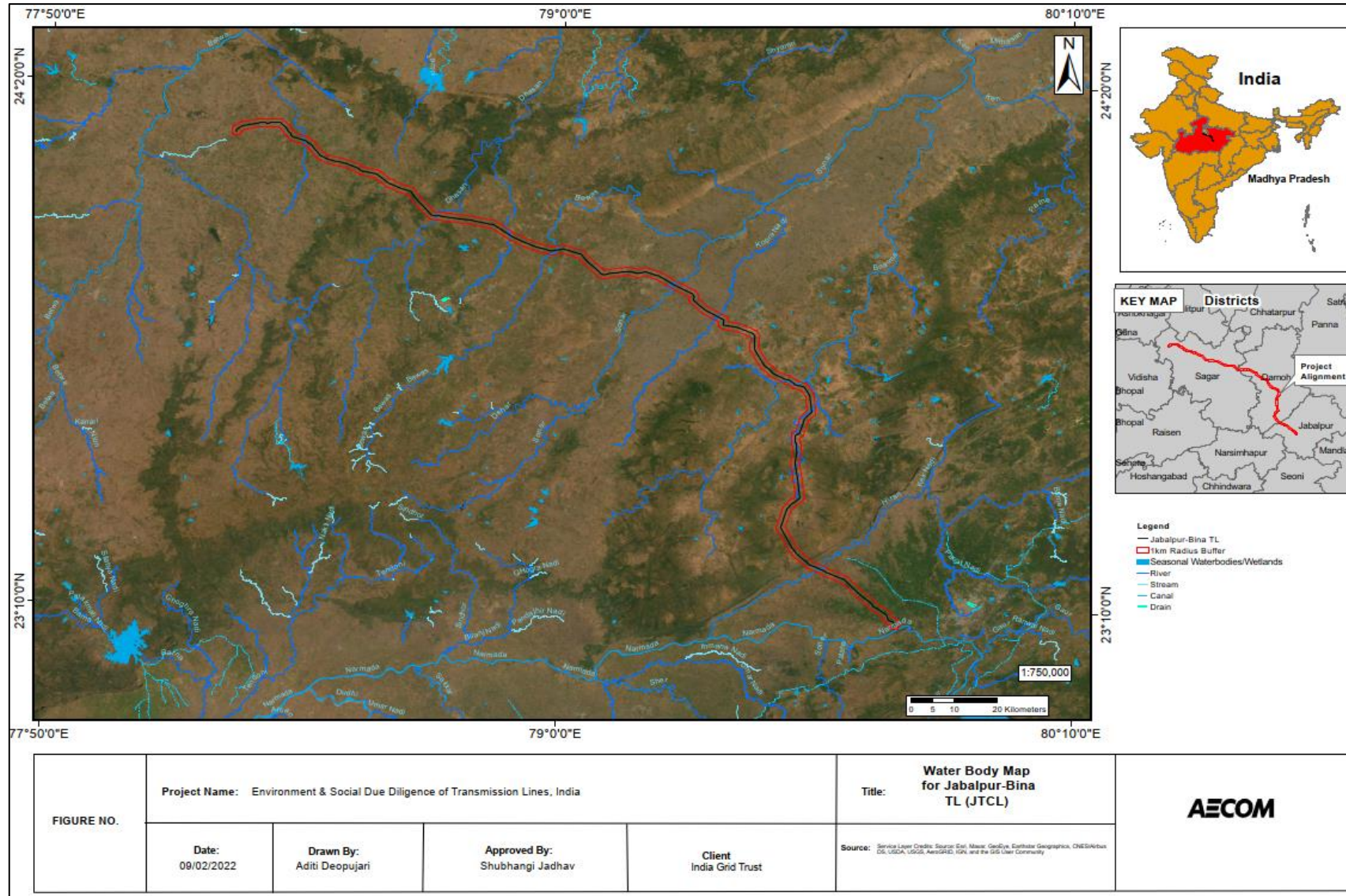


Figure 3-5: Waterbody Map for JTCL (Jabalpur - Bina)

3.2 Maheshwaram Transmission Limited (MTL)

MTL constitutes a key component in enabling the southern region of India to draw more power from the rest of the grid and seeks to address the issue of power stability in the state of Telangana. MTL operates two EHV overhead transmission lines with a total circuit length of ~477 ckms in the state of Telangana. MTL also has four 400kV line bays. The improved grid connectivity has facilitated power procurement from the Inter State Transmission System (ISTS) network to the beneficiary states Telangana, Tamil Nadu, Seemandhra and Karnataka to meet their electricity demands.

MTL operates two EHV overhead transmission lines in the state of Telangana, comprising one 400kV D/C line of approximately 197 ckms from Maheshwaram to Mehboob Nagar in Telangana and one 400kV D/C line of approximately 279 ckms from Nizamabad to Yeddumailaram in Telangana. MTL also has four 400kV line bays. The Maheshwaram – Mehboob Nagar 400 kV D/C transmission line was commissioned on December 14, 2017, while the Nizamabad – Yeddumailaram 400 kV D/C transmission line was commissioned on October 14, 2017. The project was fully commissioned on December 14, 2017.

IndiGrid acquired MTL from Sterlite Sponsor in February 2018 and currently 100% ownership is with IndiGrid.

The details on MTL's transmission lines and substations are provided in **Table 3-2** below.

Table 3-2: MTL's Transmission Lines

Sr. No.	Transmission Line / Substation	Route Length (ckms)	Specifications	Commission Date
1.	Maheshwaram (PG) – Mehboob Nagar	196	400 kV D/C Transmission Line	December 14, 2017
2.	Nizamabad – Yeddumailaram (Shankarpalli)	278	400 kV D/C Transmission Line	October 14, 2017

Source: <https://www.indigrid.co.in/portfolio-assets/maheshwaram-transmission-limited/>

Geographical spread of transmission line is given in Figure 3-6 and Figure 3-7 below.

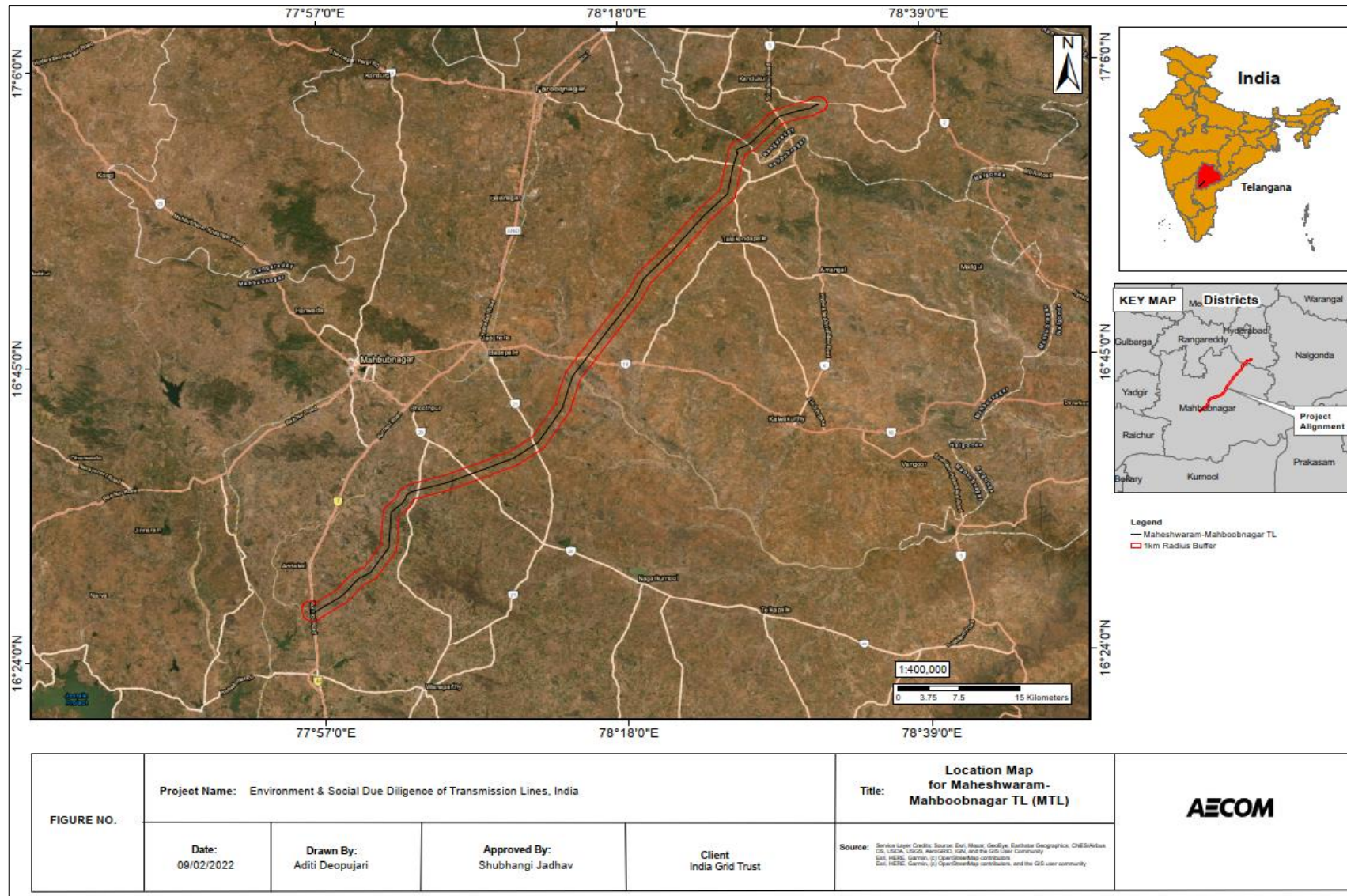


Figure 3-6: MTL Transmission Line (Maheshwaram – Mehboob Nagar)

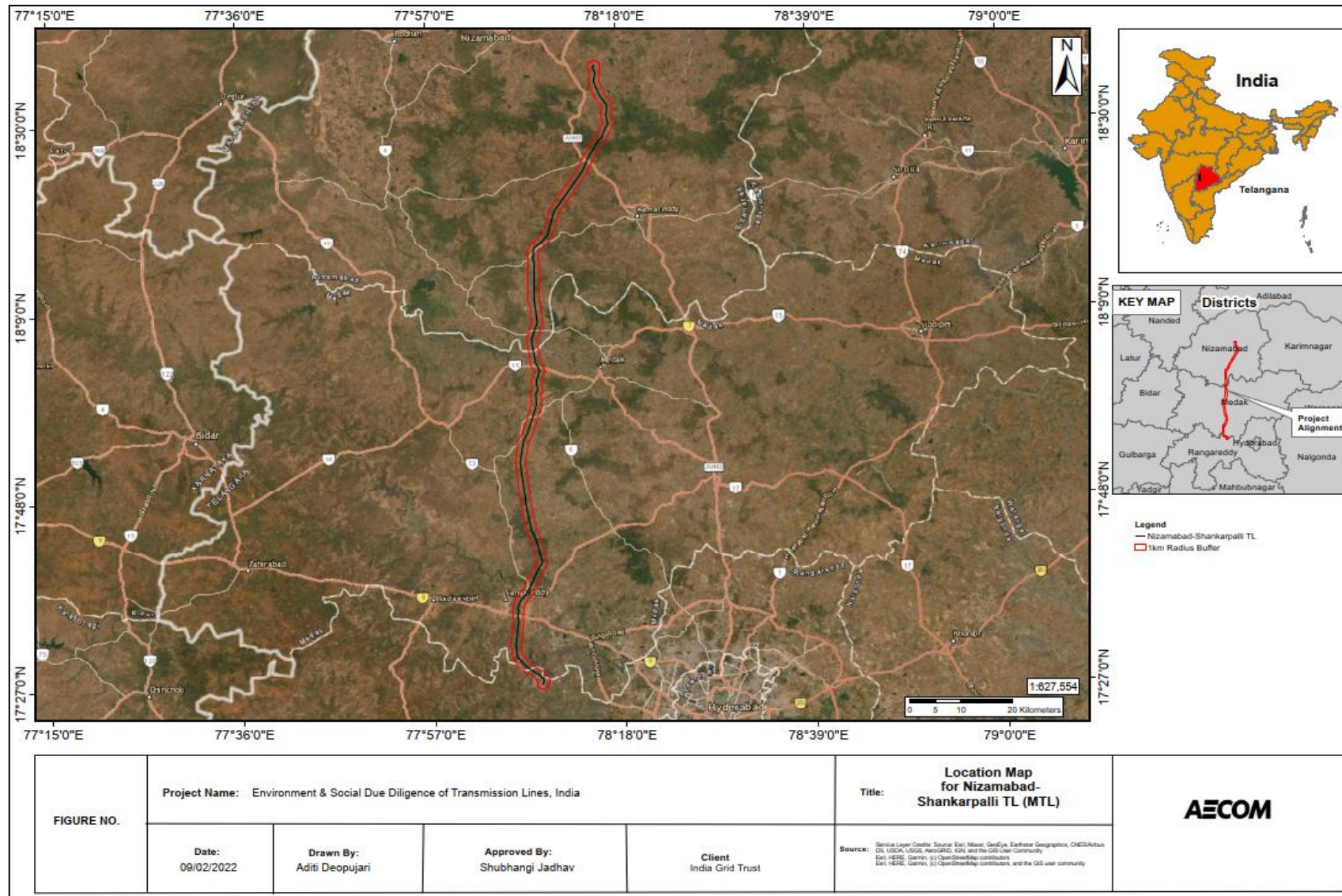


Figure 3-7: MTL Transmission Line (Nizamabad – Shankarpalli)

3.2.1 Project Details

Maheshwaram Transmission Limited (MTL) is a Special Purpose Vehicle (SPV) setup by IndiGrid for Operation and Maintenance (O&M) of the asset. M/s JBS Enterprises has been engaged as the Asset Management Company (O & M) for the project operations.

As per the consultation with IndiGrid site representative, regular maintenance work is carried out round the year which includes trimming of bushes if they fall in the clear height of the transmission lines being one of the many activities performed during patrolling. Precautions like using safety helmet, safety belt while working at height were used during maintenance activities. However, as reported no tower cranes are used at site during O&M work.

Organisation Structure

The project operations are managed by the Line Incharge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to Line Incharge as well as the Supervisor of O & M contractor. The site level organisation structure of MTL is provided in the Figure 3-8 below.

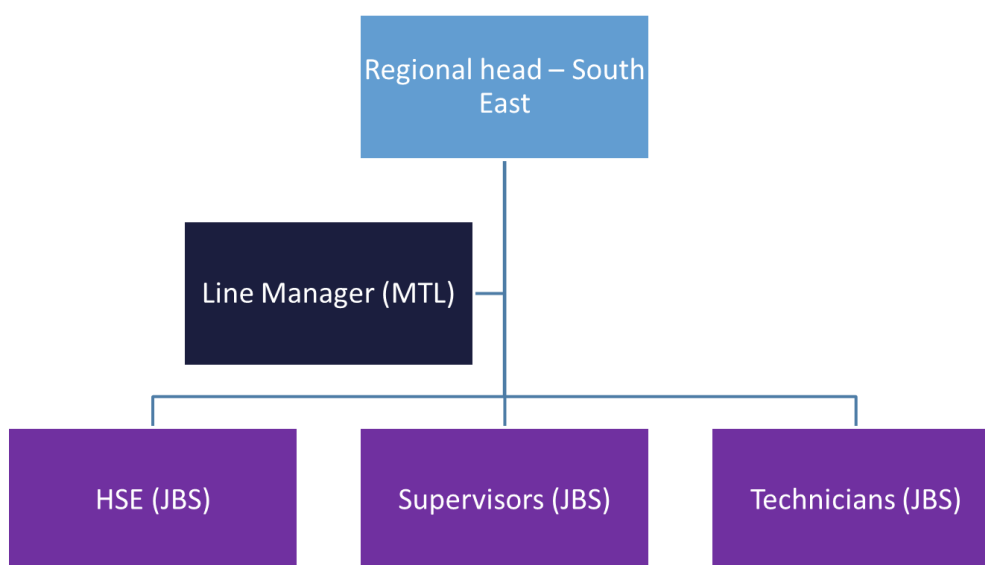


Figure 3-8: Site – level organization structure of MTL

Resource Requirements:

Land Requirement

The project has two transmission lines passing through 142 villages across 4 districts in Telangana state. The combined corridor area of 1095.95ha passes through 98.5% of private land and 1.5% of forest land. The forest clearance had been obtained in 2018. The Right of Way for the tower base area and high voltage line was obtained under the Electricity Act 2003 and Indian Telegraph Act 1885. The procurement of land was undertaken by the asset developer.

The transmission lines are directly connected to the Government Grid stations, therefore, there are no project operated substations for this project. IndiGrid reported that no additional land was procured for access roads. The existing roads are being used to access the line and towers.

Workforce Requirement

IndiGrid has appointed 1 O & M contractor to carry out operations and maintenance activities across the transmission lines. The contractor has engaged 22 workers for the work. As reported and observed during site visit there are no female workers engaged for this project.

The site team includes a Line Incharge, Project manager, Engineer, HSE officer, Technicians and Supervisors.

Water Requirement

As informed, there is no requirement of water for project operations. For drinking purposes at site office and worker's accommodation, packaged drinking water (~40L/day) is sourced from water vendors.

Waste Management

Waste generated from site office consists of paper waste mostly which is disposed off as scrap through waste vendors. The waste generated at worker's accommodation is regularly disposed off through municipal vehicle. Minimal quantities of hazardous waste such as used oil generated during maintenance activities of the transmission line and towers is disposed by the O & M contractor as per the regulatory requirements.

Schedule V Areas

The transmission line does not pass through a Schedule V area.

Status of Pending Litigations

It is understood that a litigation was filed against MTL (among other parties including District Collector, Kamareddy District; the Chairman and Managing Director, the REC Transmission Projects; the Union of India representative, Ministry of Energy; the State of Telangana representative, Revenue Department, Hyderabad) in 2017 regarding compensation claim for erection of high tension line from farm lands. High Court ordered that MTL along with REC Transmission Projects pays the compensation that would be fixed by the District Collector, Kamareddy District as compensation towards damages caused by erection of electric transmission towers and drawing high voltage transmission lines in and across the said lands. Secondary information states that MTL was directed to pay INR 0.47 million per case, which was paid by MTL, Sterlite. IndiGrid confirms that the case has been disposed off. Proof of payment is yet to be seen for review.

Whether these issues were raised as a complaint to the developer or government authorities before being filed as a legal case, is not known. There is in general lack of understanding on grievance handling systems of the developer. Although it is known that grievances and resolutions were not documented during the construction stage.

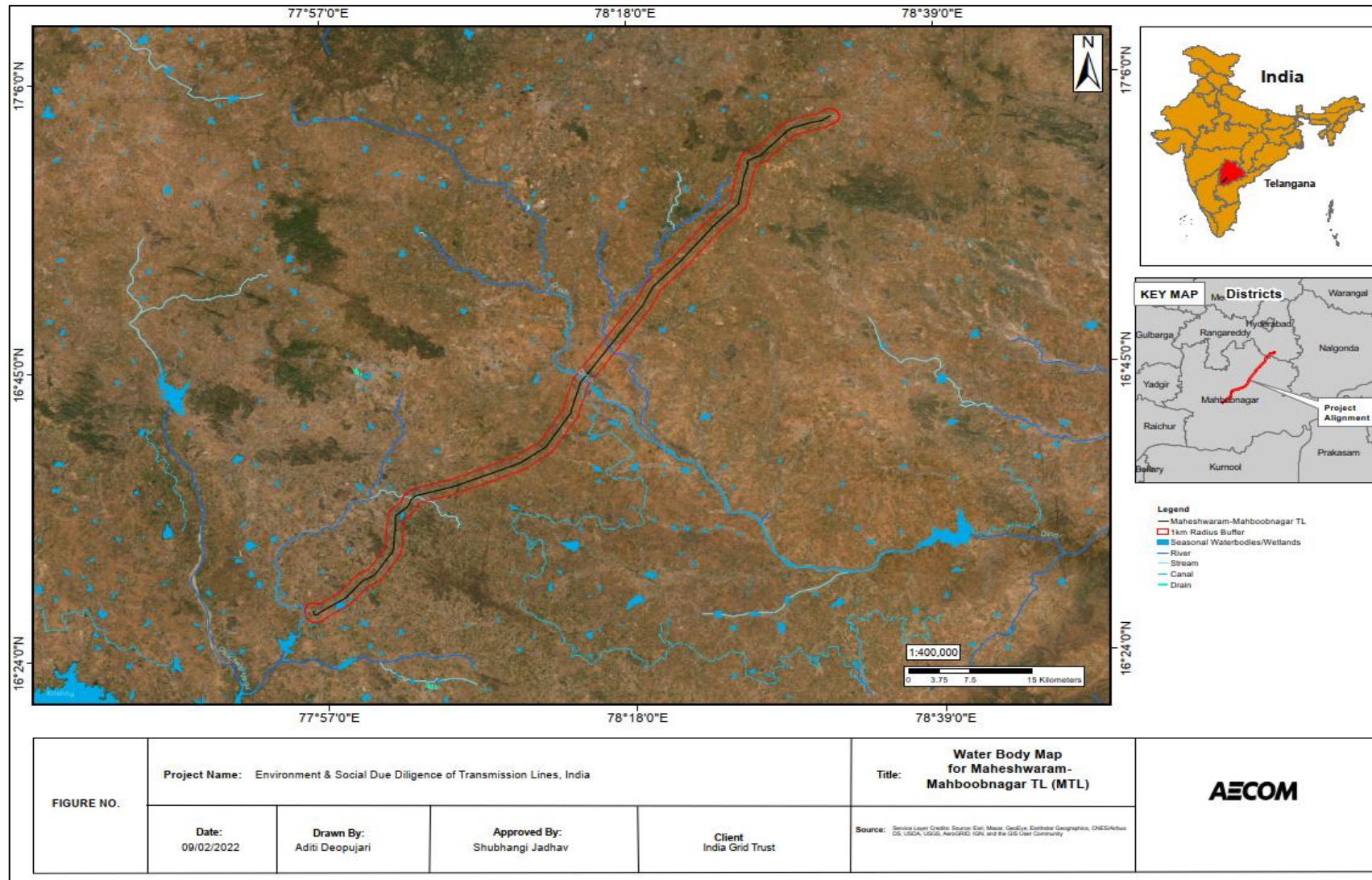


Figure 3-9: Waterbody map of MTL Transmission Line (Maheshwaram – Mehboob Nagar)

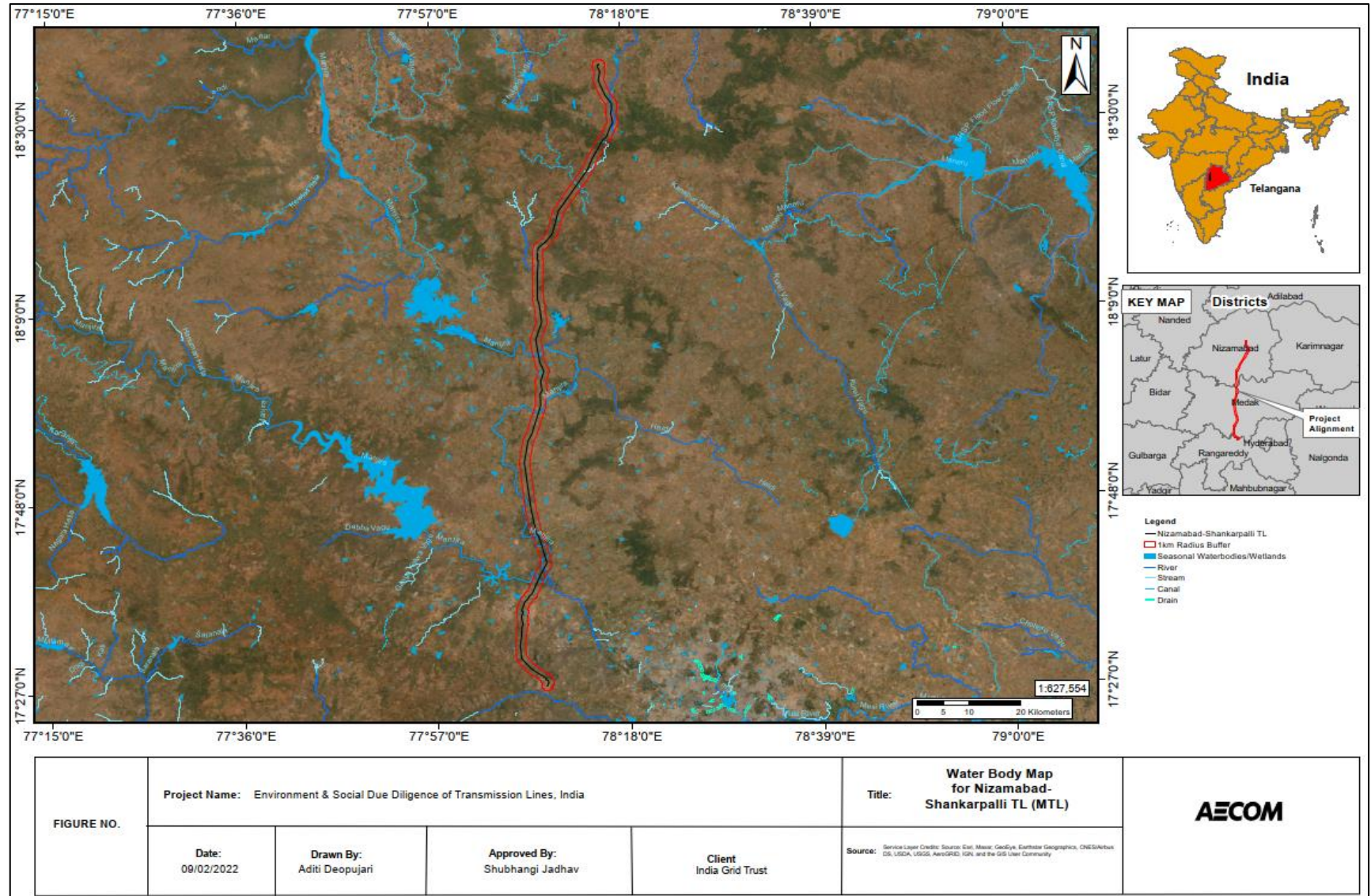


Figure 3-10: Waterbody map of MTL Transmission Line (Maheshwaram – Mehboob Nagar)

3.3 Purulia & Kharagpur Transmission Company Limited (PKTCL)

The PKTCL project was brought into existence by Sterlite Power, to increase the generation capacity in eastern parts of India. PKTCL supports the interconnection of the West Bengal state grid and the ISTS and facilitates the exchange of additional power between them. PKTCL was established to strengthen the transmission system in the states of West Bengal and Jharkhand.

PKTCL operates two EHV overhead transmission lines with a total circuit length of approximately 545 ckms in the states of West Bengal and Jharkhand, comprising one 400 kV D/C line of approximately 322 ckms from Kharagpur (West Bengal) to Chaibasa (Jharkhand) and one 400 kV D/C line of approximately 223 ckms from Purulia (West Bengal) to Ranchi (Jharkhand). The Kharagpur-Chaibasa 400 kV D/C transmission line was commissioned in June 2016, while the Purulia – Ranchi 400 kV D/C transmission line was commissioned in January 2017. The project was fully commissioned in January 2017.

IndiGrid acquired PKTCL from Sterlite Power in February 2018 and currently 100% ownership is with IndiGrid.

The details on PKTCL's transmission lines and substations are provided in **Table 3-3** below.

Table 3-3: PKTCL's Transmission Lines

Sr. No.	Transmission Line / Substation	Route Length (ckms)	Specifications	Commission Date
1.	Kharagpur – Chaibasa (K-C)	323	400 kV D/C Transmission Line	June 18, 2016
2.	Purulia – Ranchi (P-R)	223	400 kV D/C Transmission Line	January 7, 2017

Source: <https://www.indigrid.co.in/portfolio-assets/purulia-kharagpur-transmission-company-limited/>

Geographical spread of transmission line is given in Figure 3 11 and Figure 3 12 below.

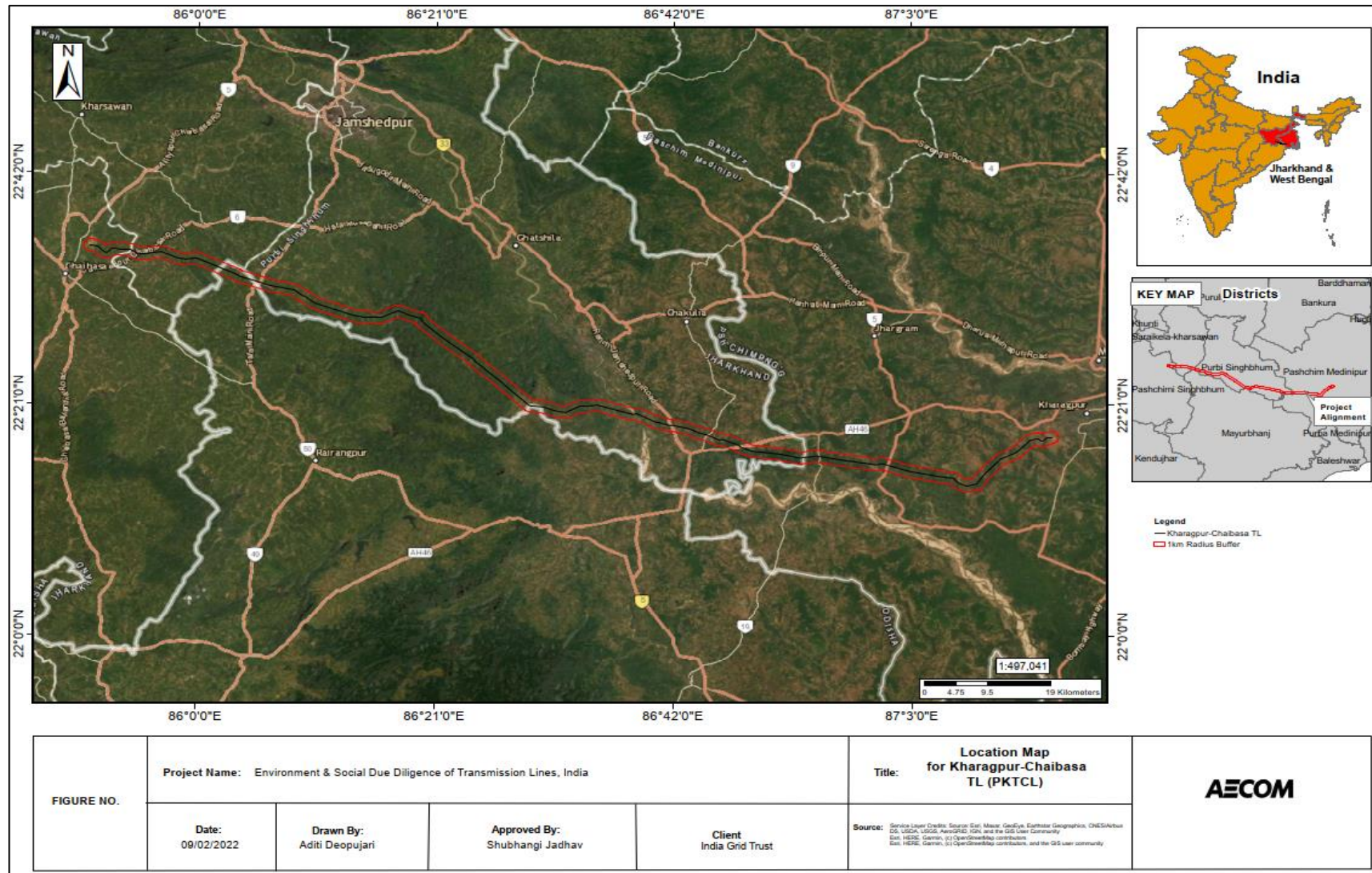


Figure 3-11: PKTCL Transmission Line (Kharagpur – Chaibasa)

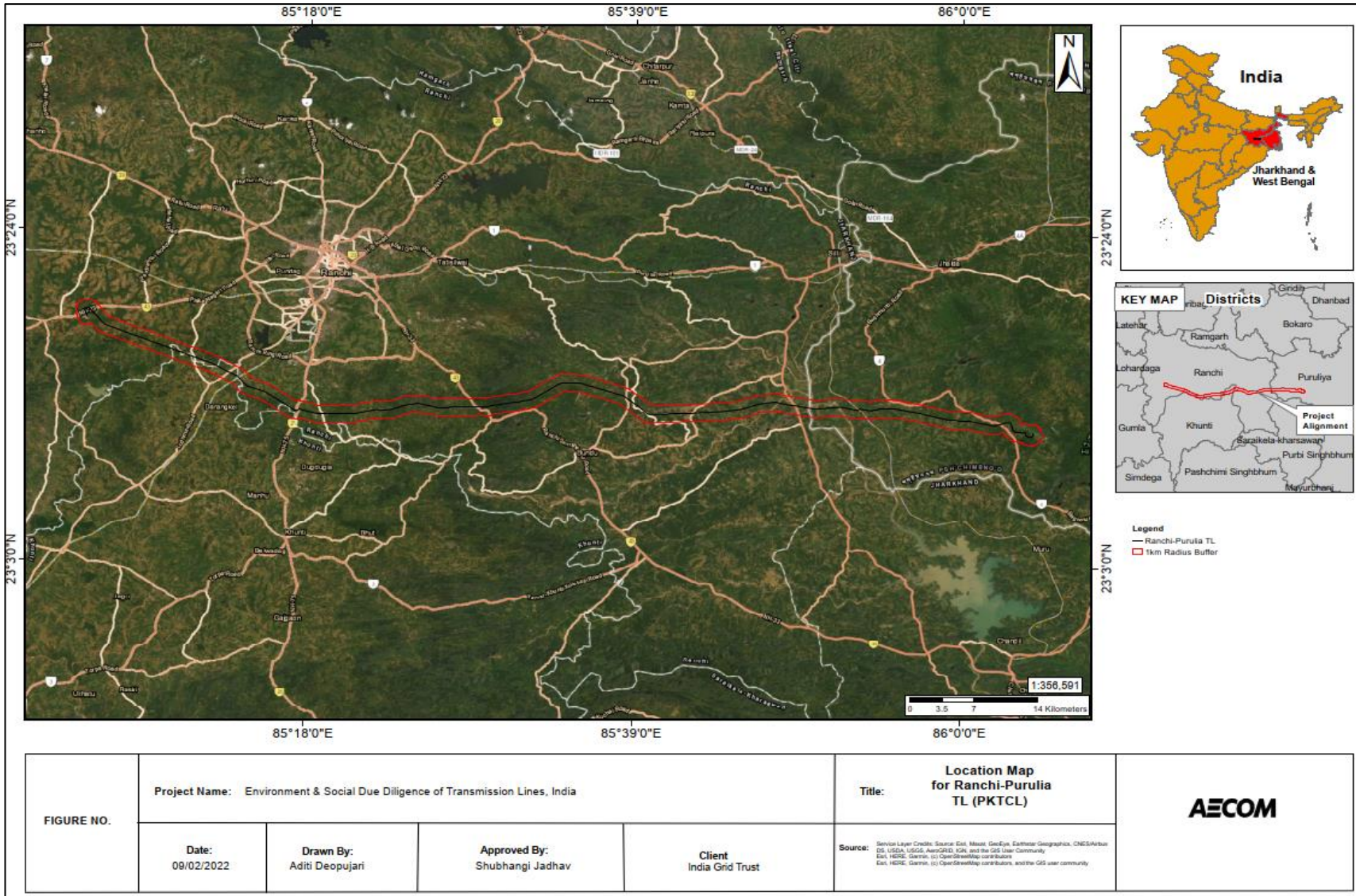


Figure 3-12: PKTCL Transmission Line (Purulia - Ranchi)

3.3.1 Project Details

Purulia and Kharagpur Transmission Company Limited (PKTCL) is a Special Purpose Vehicle (SPV) setup by IndiGrid for Operation and Maintenance (O&M) of the transmission lines. M/s JBS Enterprises has been engaged as the Asset Management Company (O & M) for the project operations (with ref to work order dated 25th January 2017). As indicated in Table 3-3, there are two transmission line networks, K-C and P-R. One (01) Line In charge has been deployed from IndiGrid for overlooking and managing the project operations.

As per the consultation with IndiGrid site representative, regular maintenance work is carried out round the year which includes trimming of bushes if they fall in the clear height of the transmission lines being one of the many activities performed during patrolling. Precautions like using safety helmet, Safety Vest (Saffron Jacket), Goggles, Hand Gloves, Leg Guard (Protection from Snake bite), Honey Bee Suit, safety belt while working at height were used during maintenance activities.

Organisation Structure

The project operations are managed by the Line In charge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to Line in charge as well as the Supervisor of O & M contractor. The site level organisation structure of PKTCL is provided in the Figure 3-13 below.

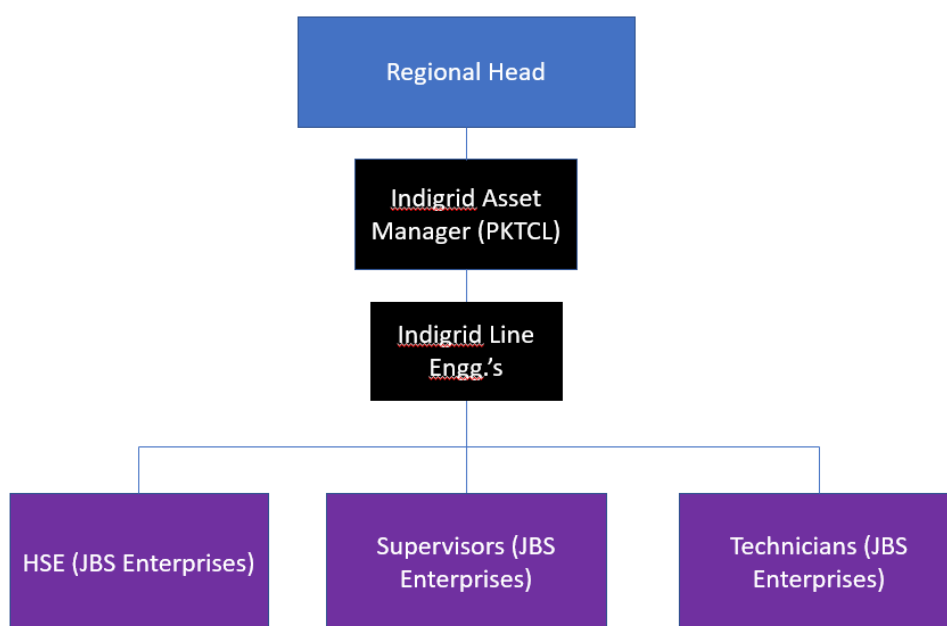


Figure 3-13: Organizational Structure at PKTCL Transmission Line

Resource Requirements:

Land Requirement

The project comprises of two transmission lines passing through two states each, Jharkhand and West Bengal. The total transmission corridor is of 1256.72ha, out of which 90.5% passes through private land and remaining through forest land. The forest clearances have been obtained for the same. As reported, the lines pass through 578 villages across 8 districts in 3 states Jharkhand, West Bengal, and Odisha. The Right of Way for the tower base area and high voltage line was obtained under the Electricity Act 2003 and Indian Telegraph Act 1885. The procurement of land was undertaken by the asset developer.

The transmission lines are directly connected to the Government Grid stations, therefore, there are no project operated substations for this project.

IndiGrid reported that no additional land was procured for access roads. The existing roads are being used to access the line and towers.

Workforce Requirement

IndiGrid has appointed 1 contractor to carry out operations and maintenance activities across the transmission lines. The contractor has engaged 27 workers to manage project work. As reported and observed during site visit there are no female workers engaged for this project.

There are separate site teams for KC line and PR line each comprising of a Project manager, Engineer, HSE officer, and Technicians & Supervisors.

Water Requirement

As informed, there is no requirement of water for project operations. For drinking purposes at site office and worker's accommodation, packaged drinking water (~20L/day) is sourced from water vendors. For domestic purposes, bore-well water is used at all the offices.

Drainage

The site office and workers accommodation are rented residential units, utilizing the domestic drainage system.

Waste Management

Waste generated from site office and at worker's accommodation is regularly disposed off at a designated local municipality waste collection area. The wastes generated are mostly domestic usage, are segregated into wet/dry wastes, and are disposed in the designated area provided by the government. This space is reported to be closed periphery and not an open dumping zone.

Schedule V Areas

Approximately 158km of line passes through Schedule V area. These areas involve 367 villages across 4 districts in Jharkhand state.

Status of Pending Litigations

There are no pending litigations with respect to project land.

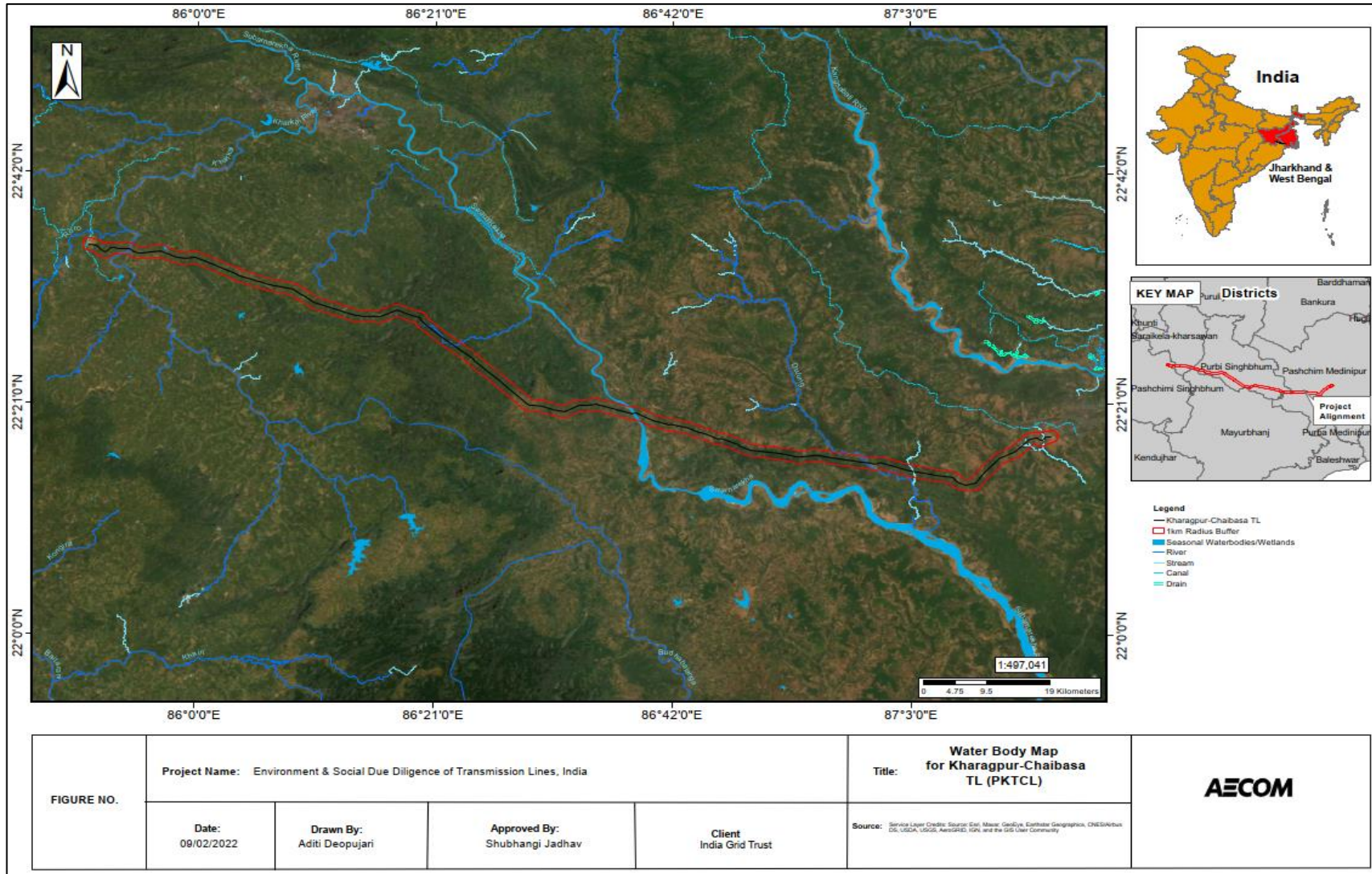


Figure 3-14: Waterbody map for PKTCL Transmission Line (Kharagpur - Chaibasa)

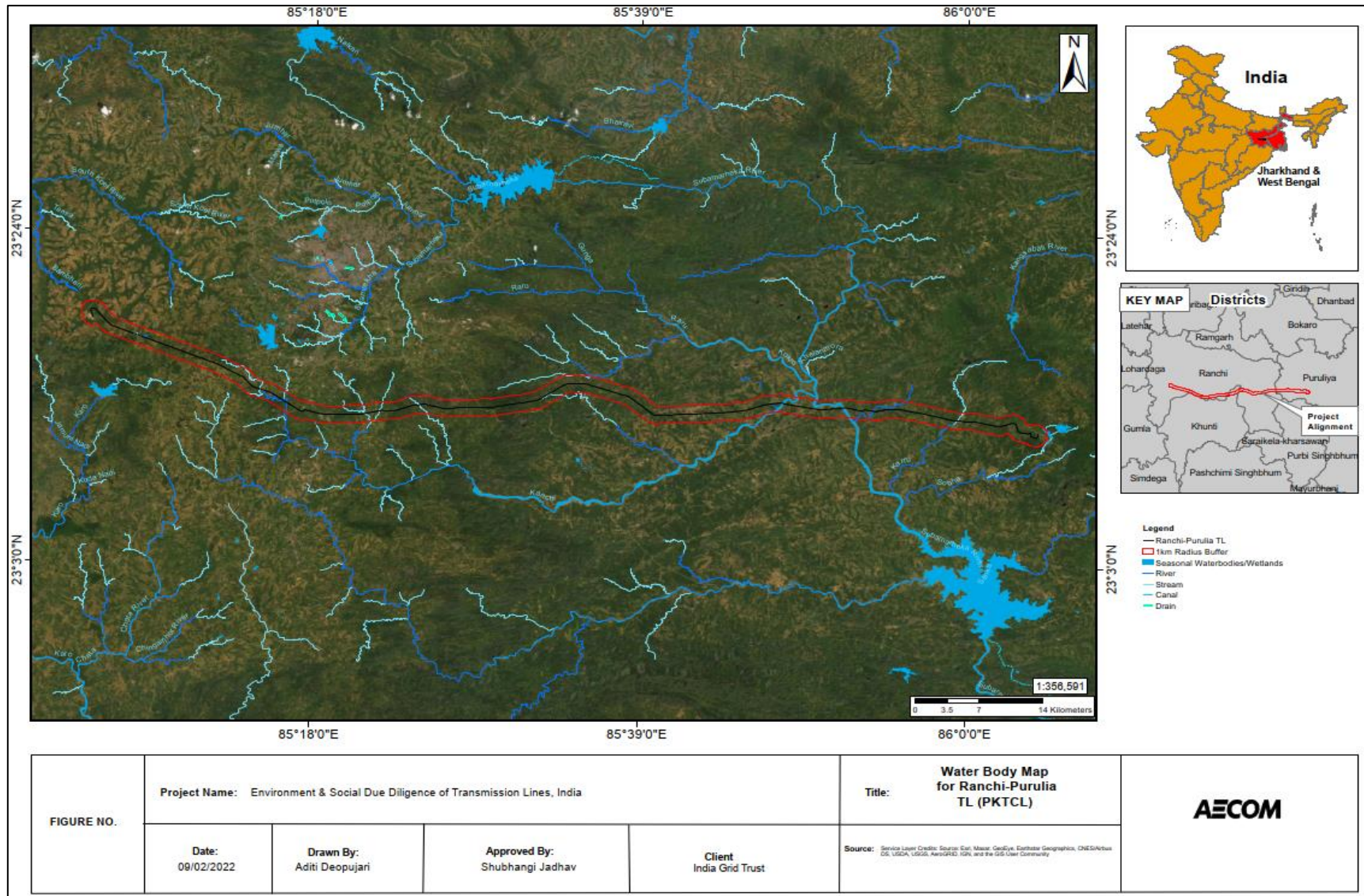


Figure 3-15: Waterbody map for PKTCL Transmission Line (Purulia - Ranchi)

3.4 RAPP Transmission Company Limited (RTCL)

The project was set up to transfer power from the atomic power plant near Kota (Rawalbhatta) in Rajasthan to Shujalpur in Madhya Pradesh to provide the path for the evacuation of electricity generated at RAPP-7 and 8. The project acts as an interregional link between the Northern and the Western region by helping in evacuation of power from the power complex even in case of any grid constraints in the Northern region.

RTCL operates one EHV overhead transmission line of approximately 403 ckms in the states of Rajasthan and Madhya Pradesh, comprised of one 400 kV D/C line from Rajasthan to Madhya Pradesh. The project was fully commissioned in November 11, 2016.

IndiGrid acquired RTCL from Sterlite Sponsor in February 2018 and currently 100% ownership is with IndiGrid.

The details of transmission lines and substations are provided in **Table 3-4** below.

Table 3-4: RTCL's Transmission Lines

Sr. No.	Transmission Line / Substation	Route Length (ckms)	Specifications	Commission Date
1.	RAPP - Shujalpur	403	400 kV D/C Transmission Line	March 1, 2016

Source: <https://www.indigrid.co.in/portfolio-assets/rapp-transmission-company-limited/>

Geographical; spread of transmission line is given in figure below.

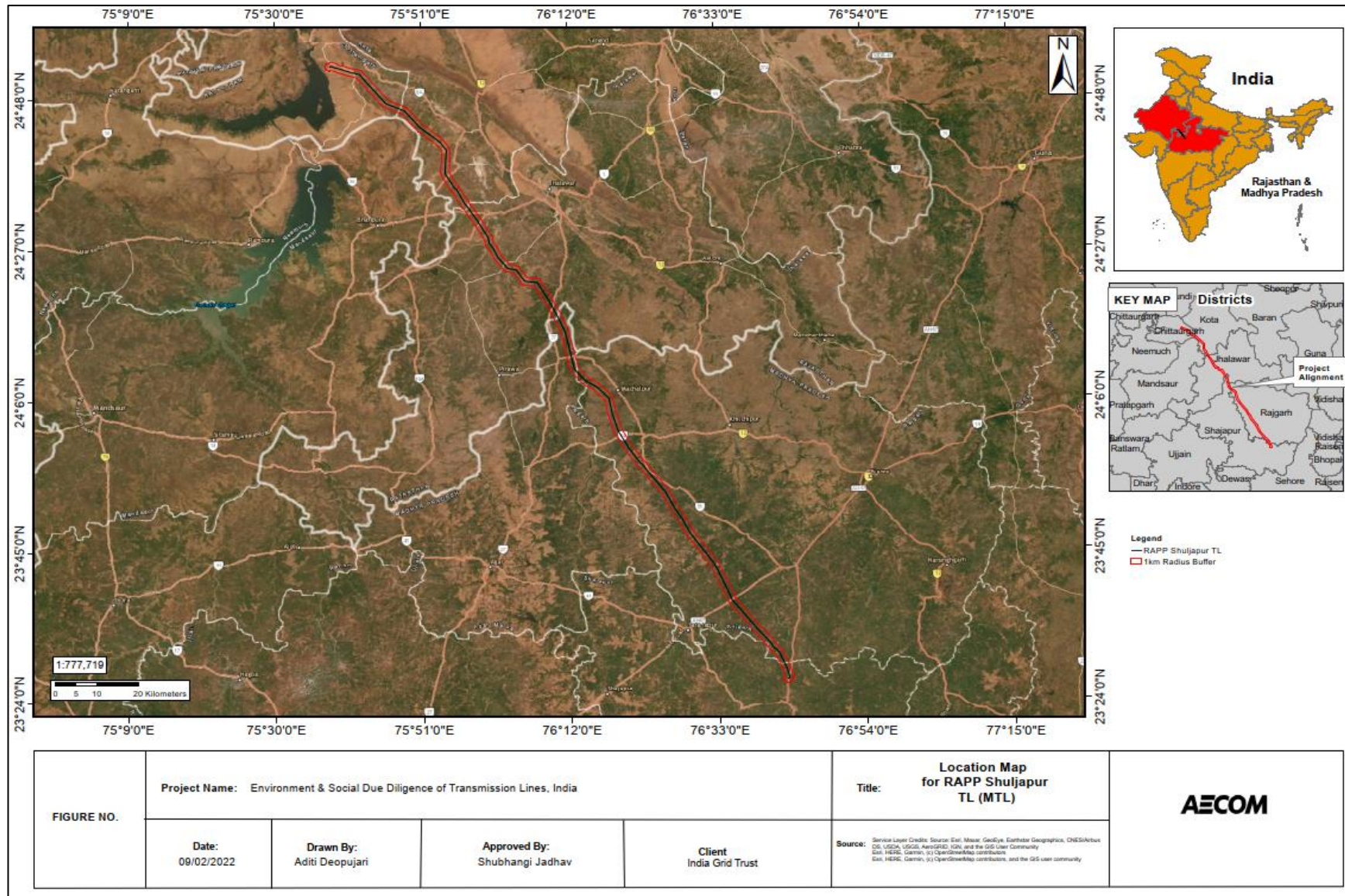


Figure 16-16: RTCL Transmission Line

3.4.1 Project Details

IndiGrid has acquired the RAPP Transmission Company Limited (here after referred to as 'RTCL' or 'the Project') which is a wholly owned subsidiary of IndiGrid Limited, a Special Purpose Vehicle (SPV) from the Sterlite Power Transmission Limited (Sponsor) on February 2018. The RTCL strengthens the transmission capability between the northern and western sectors of India's power grid by evacuating electricity from an atomic power plant near Kota in Rajasthan to central Madhya Pradesh.

RTCL, incorporated on December 20, 2012, was established as a wholly owned subsidiary of Power Finance Corporation (PFC), which has been transferred to the Sterlite group after awarded the project. RTCL has constructed a total length of ~201 km, as part of the project. The project is implemented on Build, Own, Operate and Maintain basis (BOOM) basis and has a transmission service agreement (TSA) in place for 35 years

The RTCL project was set up a 400 kV D/C Transmission Line to transfer power from the Rajasthan Atomic Power Plant ("RAPP") near Kota in Rajasthan to Shujalpur in Madhya Pradesh to provide the path for the evacuation of electricity generated at RAPP-7 and 8 in Rajasthan. T

The project was fully commissioned in November 11, 2016 and facilitates the strengthening of the transmission capability between the northern and western sectors of India's power grid by evacuating electricity from an atomic power plant near Kota in Rajasthan to central Madhya Pradesh. M/s Yashmun Engineers Limited is the O&M contractor for project. A work order was signed between Starlite Grid and M/s Yashmun on 20th May 2016 for 5 years for the O&M work for kV D/C 400 RAPP-Sujalpur Transmission Line (201 Km). The completion date for the project as per the work order was 20th May 2021.

The route of transmission line is started from atomic power plant near Kota in Rajasthan and passing through 380 villages in 83 tehsils of 12 districts and terminate at Sujalpur in Madhya Pradesh State. The transmission line corridor is passing through agricultural and forest land for length of 201 Km (99 km in Rajasthan state and 102 km in Madhya Pradesh). Along the 201 Km route of transmission line, a total 521 numbers of towers were erected with the span between two towers around 400 m.

Organisation Structure

The project operations are managed by the Line In charge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to Line in charge as well as the Supervisor of O & M contractor. The site level organisation structure of RTCL is provided in the Figure 3-13 below.

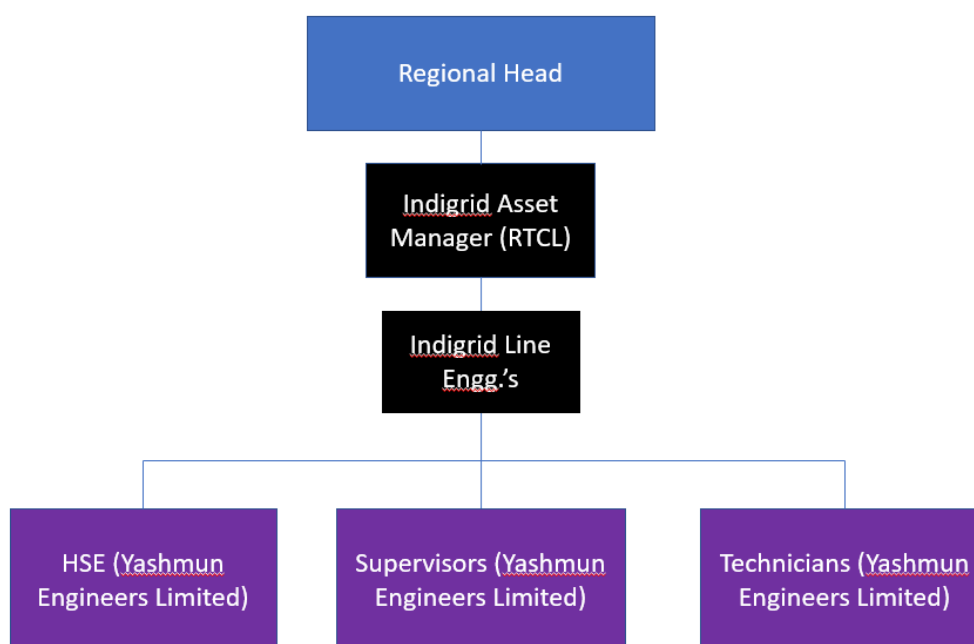


Figure 3-17: Organizational Structure at RTCL Transmission Line

Resource Requirements:

Land Requirement

The project involves operation of one 400kV transmission line passing through 5 districts in 2 states Rajasthan and Madhya Pradesh. The total area under the transmission corridor admeasures 975.16ha, out of which nearly 2.5% of area passes through forest land. The forest clearance had been obtained in year 2015. The Right of Way for the tower base area and high voltage line was obtained under the Electricity Act 2003 and Indian Telegraph Act 1885. The procurement of land was undertaken by the asset developer.

The transmission lines are directly connected to the Government Grid stations, therefore, there are no project operated substations for this project. IndiGrid reported that no additional land was procured for access roads. The existing roads are being used to access the line and towers.

Workforce

IndiGrid has appointed 1 O & M contractor to carry out operations and maintenance activities across the transmission lines. The contractor has engaged 22 workers to manage project work. As reported and observed during site visit there are no female workers engaged for this project.

The site team includes a Line Incharge, Project manager, Engineer, HSE officer, Technicians and Supervisors.

Water Requirement

As informed, there is no water requirement for project operations. For drinking purposes at site office and worker's accommodation, packaged drinking water (~100kL/day) is sourced from local vendors.

Drainage

The site office and workers accommodation are rented residential units, utilizing the domestic drainage system.

Waste Management

Waste generated from site office and at worker's accommodation is regularly collected, segregated and stored in bins. The wastes generated are mostly domestic usage, are segregated into wet/dry wastes in 60L capacity bins and are disposed in the designated area provided by the government.

Schedule V Areas

The transmission line does not pass through a Schedule V area.

Status of Pending Litigations

There are no pending litigations with respect to project land.

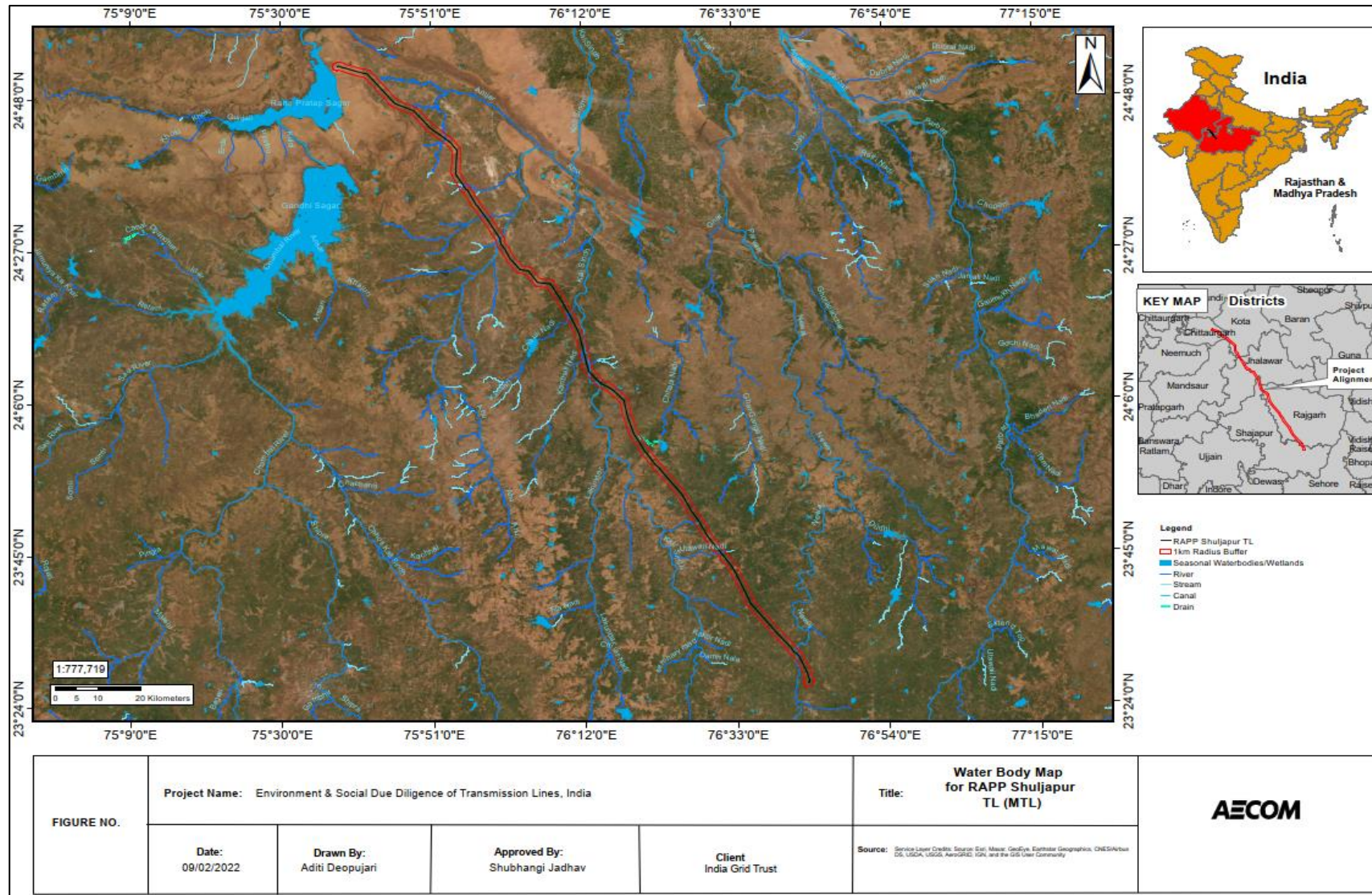


Figure 3-18: Waterbody map for RTCL Transmission Line

3.5 Odisha Generation phase-II Transmission Limited (OGPTL)

The OGPTL project is a part of Common Transmission System for Phase – II Generation Projects and Immediate Evacuation System for OPGC Project in Odisha. OGPTL consists of two transmission lines totalling over 700 ckms connecting Odisha and Chhattisgarh. The Jharsuguda-OPGC 400kV D/C transmission line was commissioned in August 2017 and Raipur- Jharsuguda line was commissioned in April, 2019.

IndiGrid acquired OGPTL from Sterlite Sponsor in July 2019 and currently 100% ownership is with IndiGrid.

The details on OGPTL's transmission lines and substations are provided in Table 3-1 below.

Table 3-5: RTCL's Transmission Lines

Sr. No.	Transmission Line / Substation	Route Length (ckms)	Specifications	Commission Date
3.	Raipur - Jharsuguda	610	765 kV D/C Transmission Line	April 6, 2019
4.	Jharsuguda - OPGC	103	400 kV D/C Transmission Line	August 30, 2017

Source: <https://www.indiagrid.co.in/portfolio-assets/odisha-generation-phase-ii-transmission-limited-ogptl/>

The geographical spread of the Transmission Lines is as illustrated in figure below.

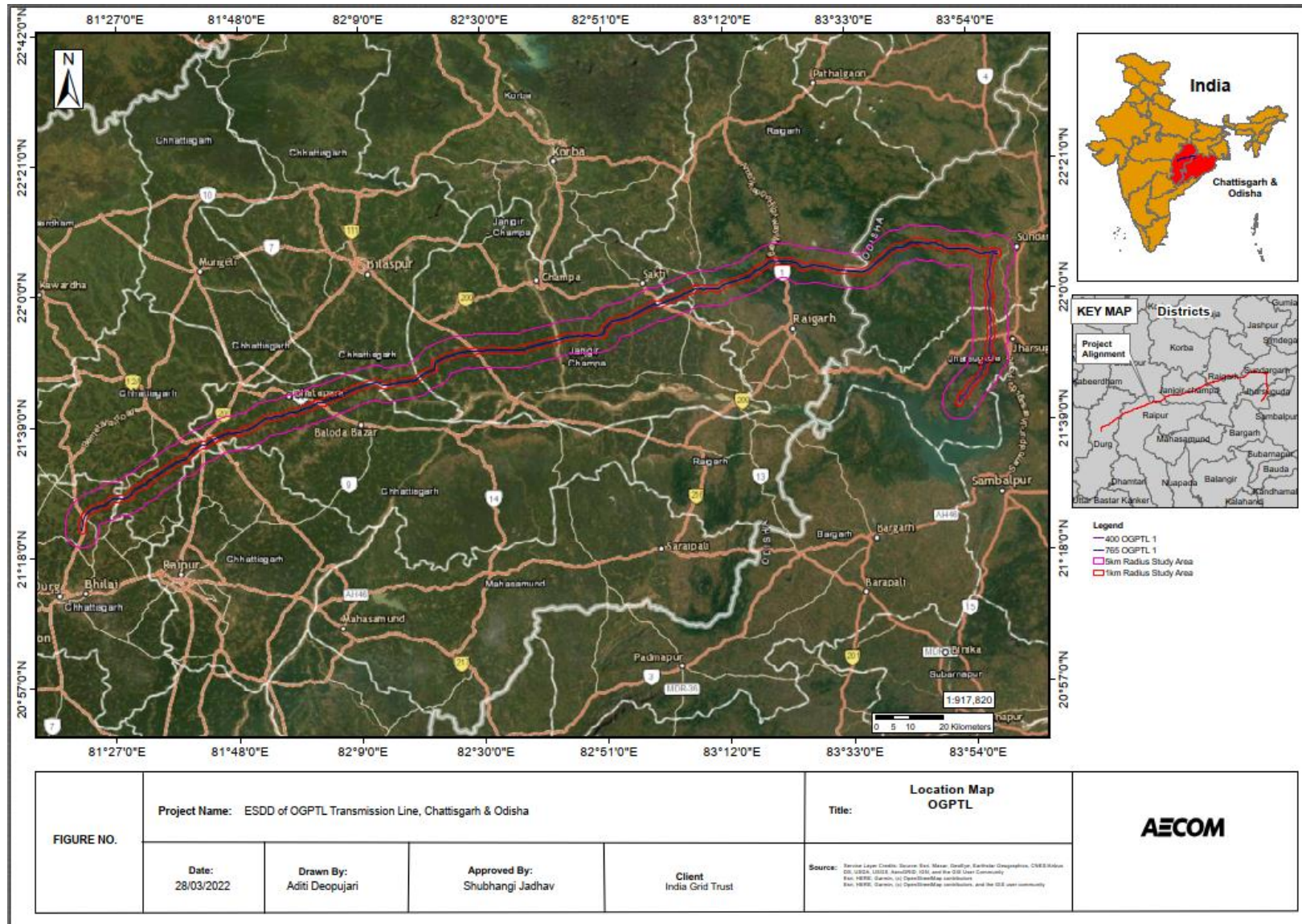


Figure 3-19: OGPTL Transmission Line Location Map

3.5.1 Project Details

OGPTL operates two EHV overhead transmission lines of approximately 713 ckms in the states of Chhattisgarh and Orissa comprising one 765 kV double circuit line of approximately 610 ckms from Raigarh (Chhattisgarh) to Jharsuguda (Orissa) and one 400 kV double circuit line of approximately 103 ckms from Jharsuguda (Orissa) to OPGC (Orissa power generation corporation limited, Orissa). OGPTL covers in total 166.42 hectares of forest area which is spread across two states Orissa (94.656 ha) and Chhattisgarh (71.761 ha).

The site is under the operation phase and was commissioned on the 6th of April 2019. The asset was acquired after the construction was completed. IndiGrid appointed JBS Enterprise Pvt. Ltd. for the operation and maintenance. As per the consultation with IndiGrid site representatives, regular maintenance work is carried out round the year which includes trimming of bushes if they fall in the clear height of the transmission lines being one of the many activities performed during patrolling. Precautions like using safety helmet, safety belt while working at height were taken. As reported tower cranes are not used for O&M work.

Organisation Structure

The project operations are managed by the Line In charge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O&M/O & M contractor. The HSE officer reports to Line In charge as well as the Supervisor of O & M contractor. The site level organisation structure of OGPTL is provided in the Figure 3.20 below.

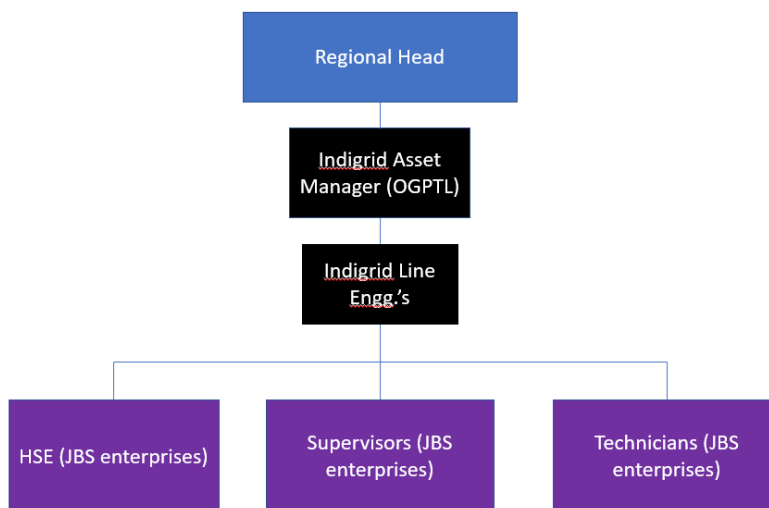


Figure 3-20: Site Level organization structure of OGPTL

Resource Requirements:

Land Requirement

The project comprises of two transmission lines passing through 8 districts in 2 states Odisha and Chhattisgarh, The total transmission corridor of the project admeasures 2278.38ha. 91% of the transmission corridor passes through private land whereas the remaining passes through forest land. Forest clearances had been obtained in 2017 and 2018. The Right of Way for the tower base area and high voltage line was obtained under the Electricity Act 2003 and Indian Telegraph Act 1885. The procurement of land was undertaken by the asset developer.

The transmission lines are directly connected to the Government Grid stations, therefore, there are no project operated substations for this project. IndiGrid reported that no additional land was procured for access roads. The existing roads are being used to access the line and towers.

Workforce Requirement

IndiGrid has appointed 1 O & M contractor to carry out operations and maintenance activities across the transmission lines. The contractor has engaged 32 workers to manage project work. As reported and observed during site visit there are no female workers engaged for this project.

The site team includes an Engineer, an EHS head, and a Superintendent for each hub and Asset Manager being common entire project and one Officer Engineer for each of the two lines.

Water Requirement

There is no need for water requirement for the transmission lines operation, as reported during the site visit. For day-to-day water requirements at hubs where the employees stay, they use bottled mineral water (available at different quantity as per their need) for drinking purpose and boring water available in the society for bathing and daily needs. For transmission line activities, water is not required for maintenance activities. However, it was noted that in IndiGrid's Jharsuguda site office has portable water filter and in total 4-5 litres of water is used daily. O & M have provided residence for their employees where at two of the total 5 hubs they have borewell for water usage and on other hubs 20 L water cans are used.

Drainage

There is no specific drainage provision required for Transmission lines.

Waste Management

Waste generated at the site are mostly paper waste and tea bags from kitchen waste category which are disposed off through local vendors. Waste generated at worker's accommodation are mostly kitchen wastes which is collected in a dustbin and is taken by the local municipal authorities next morning.

Schedule V Areas

Approximately 95km of line passes through Schedule V area. These areas involve 550 villages across 2 districts in 2 states that are Chattisgarh and Odisha.

Status of Pending Litigations

There are 3 pending litigations with respect to the land under this project. Two of these are filed against OGPTCL in 2017 and 2018; whereas it is a party to one litigation filed against the state of Chhattisgarh in 2018. In two of the cases petitioners have demanded for diversion of the transmission line from their land whereas in one case, the petitioner has claimed compensation for the right of way taken for the project. Two cases are pending at High court and one at District court. Secondary information shows another litigation against OGPTL in Orissa High Court against construction of transmission line through forest area without obtaining consent from Gram Sabha. The matter is pending.

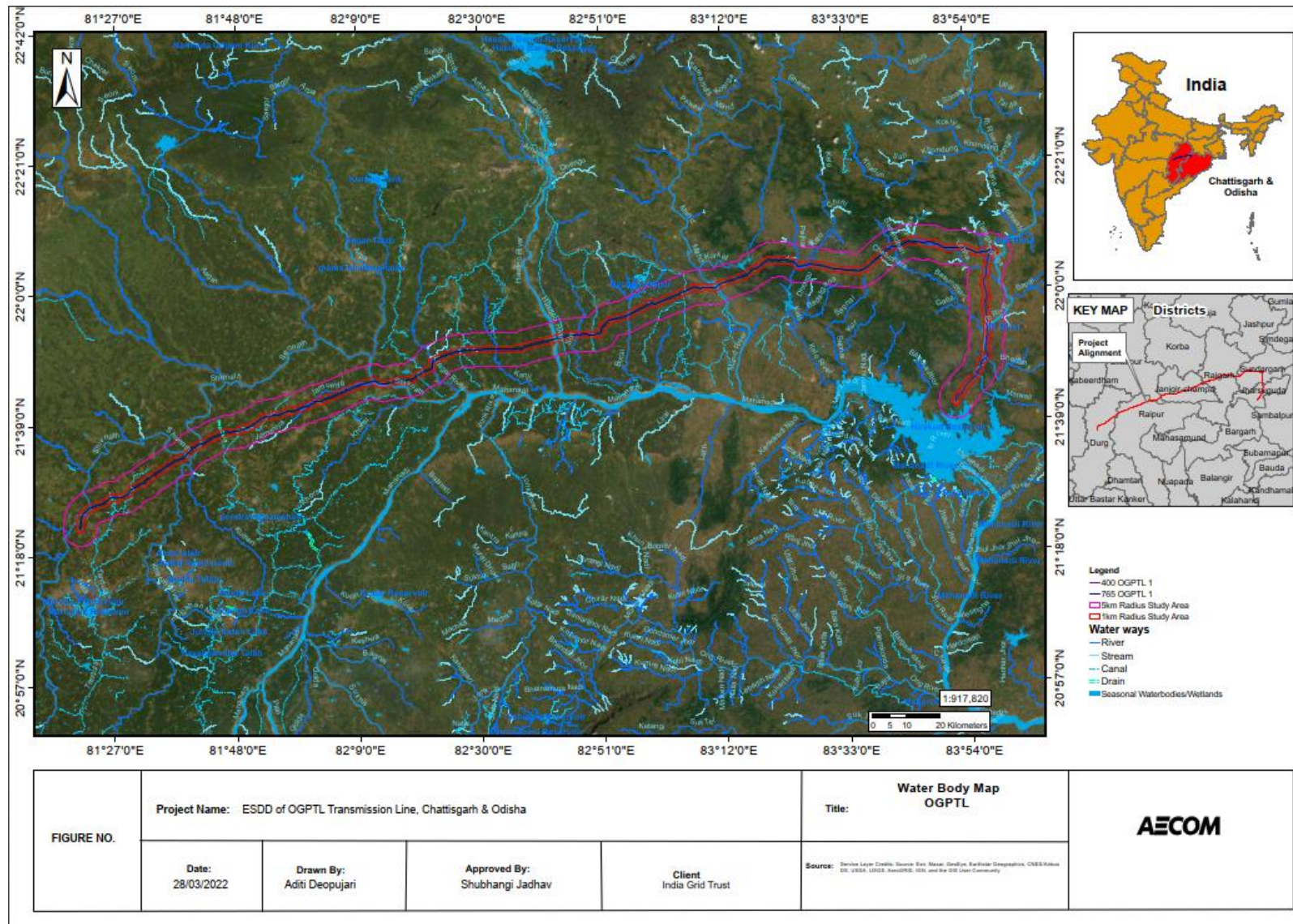


Figure 3-21: OGPTL Transmission Line waterbody Map

4. Asset Specific Compliance to Applicable Reference Framework and Status of Key Permits & Licenses

4.1 IFC Performance Standards, 2012

An overview of IFC Performance Standards (2012) and their applicability to the project are provided in the table below.

Table 4-1: Broad overview of IFC Performance Standards (PS) and their Applicability to the Projects

S. No.	IFC PS	Overview	Applicability to the Project Assets				
			JTCL	MTL	PKTCL	RTCL	OGPTL
1.	PS 1: Assessment and Management of Environmental and Social Risks and Impacts	This PS aims to assess the existing social and environmental management systems of a company and to identify the gaps with respect to their functioning, existence and implementation of any Environmental and Social Management Plan (ESMP) and procedures, a defined EHS Policy, organization chart with defined roles and responsibilities, risk identification and management procedures as well as processes like stakeholder engagement and grievance management.	Applicable				
			The PS1 is applicable to projects with environmental and/ or social risks or impacts. The asset is an operational Transmission Line – hence predicted to have E&S impacts.				
2.	PS 2: Labour and Working Conditions	This PS is guided by a number of international conventions and instruments on labour and workers' rights. It recognises that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of fundamental rights of workers. The PS covers following themes: human resource policy and management, workers' organization, non-discrimination and equal opportunity, retrenchment, protecting the workforce and occupational health and safety. It applies to workers directly engaged by the client (direct workers), workers engaged through third parties to perform work related to core business processes of the project for a substantial duration (contracted workers), as well as workers engaged by the client primary suppliers (supply chain workers).	Applicable				
			The PS2 is applicable with respect to all the permanent employees and contract workers engaged in operation and maintenance activities/ in addition to repair work, along the transmission line. This also looks at the potential occupational health and safety risks during the O&M phase, including live power lines, EMF risks and working at height.				

S. No.	IFC PS	Overview	Applicability to the Project Assets				
			JTCL	MTL	PKTCL	RTCL	OGPTL
3.	PS 3: Resource Efficiency and Pollution Prevention	PS-3 covers the use resources and materials as inputs and wastes that could affect human health. The objective of PS-3 are: to avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities; to promote more sustainable use of resources, including energy and water, and to reduce project related GHG emissions. Key themes covered under PS-3 are: pollution prevention, resource conservation and energy efficiency, wastes, hazardous materials, emergency preparedness and response, greenhouse emissions, pesticide use and management.	Applicable				
			The project is an operational transmission line. Possible pollution from O&M activities includes fugitive dust emissions, loss of vegetation in the area, handling and storage of chemicals, generation of solid waste.				
4.	PS 4: Community Health, Safety and Security	This PS-4 requires due diligence to anticipate and avoid adverse impacts on the health and safety of the affected community during the project life from both routine and non-routine circumstances. It also requires ensuring that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the affected Communities. Key areas of compliance screened under PS-4 includes: infrastructure/equipment safety, hazardous material safety, natural resource issues, exposure to disease, emergency preparedness and response, and security personnel.	Applicable				
			Given that the project is an operational Transmission Line, it has the potential to affect the health and safety of the communities located adjacent to the project area such as vehicular movement, presence of electrical lines, electric and magnetic fields risks etc.				
5.	IFC PS 5: Land Acquisition and Involuntary Resettlement	PS-5 requires project proponents to anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use. The key themes covered under this are: compensation and benefits for displaced persons, consultation and grievance mechanism, resettlement planning and implementation, physical displacement, economic displacement. The PS-5 also prescribes private sector responsibility to supplement government actions and bridge the gap between governments assigned entitlements and procedures and the requirements of PS-5.	Applicable				
			The five shortlisted Transmission Line assets have been in operations for more than 4 years and Right of Way (RoW) for these assets were acquired by the developer between 2012- 2015. Right of Way for the lines as well as for the towers was procured through the Telegraph Act 1885 which allows for compensation for damages to crops and trees/structures and puts restriction on some activities like construction of structures or planting trees in the RoW. However, the Act only gives Right of Way access to the operator and the landowner/user can continue their agricultural, grazing, or other livelihood activities that are not restricted. While land was reportedly procured by the developer through negotiation with individual landowners, there is provision within the Telegraph Act for the District Administration to intervene if landowners do not agree to give RoW access, hence PS5 is considered applicable. No resettlement or forced eviction has been reported. Economic impacts related to loss of crop or assets have been compensated according to provisions of the law. Majority of the land (>90%) for the towers and RoW was private land and the remaining was mostly government forest land. IndiGrid does not plan to acquire any additional land for these projects. While the legal liability to pay any additional compensation decided by the courts is contractually with the developer, IndiGrid will closely monitor these litigations as they can lead to stakeholder issues on the ground like refusal to allow access to the ROW or occasional disagreements. Further to the grievance mechanism proposed under ESAP #2, IndiGrid will have a grievance mechanism				

S. No.	IFC PS	Overview	Applicability to the Project Assets				
			JTCL	MTL	PKTCL	RTCL	OGPTL
			for the local community in its assets. This community GM will allow all grievances to be registered including those related to their ongoing operations as well as those related to past claims and compensation related to the LA and use of the RoW. As included in ESAP # 13 where IndiGrid is responsible for the impact, it will resolve the issue/concern and mitigate the impacts based on principles defined in PS 5. For legacy impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people).				
6.	IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	The requirements of this Performance Standard are applied to projects (i) that are located in modified, natural, and critical habitats; (ii) that potentially impact on or are dependent on ecosystem services over which the client has direct management control or significant influence; or (iii) that include the production of living natural resources e.g., agriculture, animal husbandry, fisheries and forestry. PS-6 considers relevant threats to biodiversity and ecosystem services, owing to project-related direct and indirect impacts, with a focus on habitat loss, degradation and fragmentation, introduction or spread of invasive alien species and loss or degradation of priority ecosystem services, while recognizing the differing values attached to biodiversity and ecosystem services by Affected Communities and any other stakeholders, especially Indigenous Peoples.	Applicable				
			The project alignment traverses natural & modified habitats, including potential critical habitat. Hence, PS6 is applicable to the project.	The project alignment traverses natural & modified habitats, including potential critical habitat. Hence, PS6 is applicable to the project.	The project alignment traverses natural & modified habitats, including potential critical habitat. Hence, PS6 is applicable to the project.	The project alignment traverses natural & modified habitats, including potential critical habitat. Hence, PS6 is applicable to the project.	The project alignment traverses natural & modified habitats, including potential critical habitat. Hence, PS6 is applicable to the project.
7.	PS 7: Indigenous Peoples	This Performance Standard applies to communities or groups of Indigenous Peoples who maintain a collective attachment, i.e., whose identity as a group or community is linked, to distinct habitats or ancestral territories and the natural resources therein. PS-7 endeavour to ensure that the development process fosters full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of Indigenous Peoples. Key themes covered under PS-7 are: avoidance of adverse impacts, consultation and informed participation, impacts on traditional or customary lands under use, relocation of IPs from traditional or customary lands, and cultural resources.	Applicable The construction of the transmission lines would have resulted in cutting down several trees as a part of the forest clearance process, some of which may have been used by the local tribal community, though it is expected that they would be able to continue accessing the rest of the forest area. In addition, the tribal community may have faced temporary disruption in accessing the forest during the construction. Activities such as grazing, collection of fodder and fuelwood as well as collection of NTFPs in and outside the ROW are not expected to be impacted during operations. All 5 assets have had forest rights settlement under the Forest Rights Act. The developer has tried to avoid lands identified by the community as culturally important during construction. There is however no comprehensive documentation of these impacts or an assessment of their significance which can be relied upon or base further management actions on.				
			- In JTCL, the TL has 80 km passing through Scheduled V area, intersecting with 86 villages and 3 districts and potentially impacting communities from	- The Project has triggered compliance to the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act,	- In PKTCL, the line has 158 km in Scheduled V area, intersecting with 367 villages and 4 districts potentially impacting tribal communities like	- The Project has triggered compliance to the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act,	- In OGPTL, 95 km of line goes through Scheduled V area and intersects with 550 villages and 2 districts, possibly impacting communities from the

S. IFC PS Overview
No.

Applicability to the Project Assets				
JTCL	MTL	PKTCL	RTCL	OGPTL
<p>the Gond and Dhoba tribes.</p> <ul style="list-style-type: none"> - The Project has triggered compliance to the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006. As a result, the project is required to formally recognise rights of forest dwelling communities and ensure activities undertaken align with any conditions recommended by Gram Sabhas. - The FRA certificates obtained for Mandla and Dindori districts confirm having settled the rights of Primitive Tribal Groups* and Pre-Agricultural communities**; therefore, indicating habitation of such Indigenous Peoples in the project footprint. - Different sections of nearly 80km of transmission lines of JTCL asset falls under Schedule V areas; therefore, requiring engagement with Gram Sabhas for their permission to 	<p>2006. As a result, the project is required to formally recognise rights of forest dwelling communities and ensure activities undertaken align with any conditions recommended by Gram Sabhas.</p> <ul style="list-style-type: none"> - The records show and consultations confirm involvement of Schedule Tribe landowners in the MTL project. These mainly belong to Goud tribes which is privately/individually used and not common property or communal land. 	<p>Santhals, Ho and Munda.</p> <ul style="list-style-type: none"> - The Project has triggered compliance to the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006. As a result, the project is required to formally recognise rights of forest dwelling communities and ensure activities undertaken align with any conditions recommended by Gram Sabhas. - Nearly 158km of transmission lines from PKTCL asset falls under Schedule V areas; therefore, requiring engagement with Gram Sabhas for their permission to use their land of personal and communal rights under the Provisions of the Panchayats (Extension to the Scheduled Areas) Act 1996. - There is no documentation of Sama related consultations with IndiGrid. However, locals reported that a Gram Sabha was arranged, not for the agenda of PESA, but specifically for Sama. This document could not be retrieved by them. - The records show and consultations confirm 	<p>2006. As a result, the project is required to formally recognise rights of forest dwelling communities and ensure activities undertaken align with any conditions recommended by Gram Sabhas.</p>	<p>Kisan, Sabara, Bhuiyan and Munda tribes.</p> <ul style="list-style-type: none"> - The Project has triggered compliance to the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006. As a result, the project is required to formally recognise rights of forest dwelling communities and ensure activities undertaken align with any conditions recommended by Gram Sabhas. - Approximately 95km of continual stretch of the TL passes through Schedule V areas, therefore, requiring engagement with Gram Sabhas for their permission to use their land of personal and communal rights under the Provisions of the Panchayats (Extension to the Scheduled Areas) Act 1996. - The records show and consultations confirm involvement of Schedule Tribe landowners in the OGPTL project.

S. No.	IFC PS	Overview	Applicability to the Project Assets					
			JTCL	MTL	PKTCL	RTCL	OGPTL	
			<p>use their land of personal and communal rights under the Provisions of the Panchayats (Extension to the Scheduled Areas) Act 1996.</p> <ul style="list-style-type: none"> - There was a need for FPIC process to be carried out for these assets. However, now that the project is already under operations, and there are no sector specific guidelines or stipulations for reversing the construction due to consent of any kind not been obtained – a management plan has been suggested under PS7. A structure and coverage for this plan is suggested in the recommendations to give clarity on strategy to mitigate the impacts that have already occurred. 		<p>involvement of Schedule Tribe landowners in the PKTCL project. These mainly belong to Munda and Ho tribes.</p> <ul style="list-style-type: none"> - In addition, the line passes nearby sacred groves called Sarna lands worshiped mainly by the Schedule Tribe communities in the region, including Santhal tribes. 			
8.	PS 8: Cultural Heritage	For the purposes of PS-8, cultural heritage refers to (i) tangible forms of cultural heritage; (ii) unique natural features or tangible objects that embody cultural values; and (iii) certain instances of intangible forms of culture that are proposed to be used for commercial purposes. The requirements of PS-8 apply to cultural heritage regardless of whether or not it	There is a Chausath Yogini Temple in Jabalpur district at 2.35km of aerial distance from tower 175/2. It is known to be built in by the Kalachuri dynasty during 10th	Based on secondary information review, and interaction with locals during site visit it is understood that there are no sites of cultural or historical significance	Not Applicable	Based on review of limited locations selected in accordance with information available on Sarna groves in the public domain, (tower numbers 45/9, 40/0 and 60/0 of Kharagpur-Chaibasa line)	Based on secondary information review, and interaction with locals during site visit it is understood that there are no sites of cultural or historical significance within 5km of the	Based on secondary information review, there are no sites of cultural or historical significance within 10km of the transmission corridor.

S. No.	IFC PS	Overview	Applicability to the Project Assets				
			JTCL	MTL	PKTCL	RTCL	OGPTL
		has been legally protected or previously disturbed.	century. Although there is no information of conflicts/impacts due to project activities on this site.	within 5km of the transmission corridor all along the line.	the TL passes from close proximity (5 meters) to tower 45/9 while there were no Sama groves near 40/0 and 60/0 towers. To avoid the line passing over the tower, 45/9 was shifted farther from its previous location which was reportedly directly under the line. Based on consultations, the Santhali tribal community who primarily worships the groves had no pending concerns linked to the line's influence on their practices or the grove itself. Secondly, where unavoidable the diversion of Sama land was undertaken through mutual consultations with relevant stakeholders. The exact locations of such cases are not known ²³ .	transmission corridor all along the line.	

*Note: Pre-agricultural Communities are basically tribal groups using pre-agricultural level of technology, among other attributes of being socially and economically backward and somewhat stagnant or declining growth of population.

**Note: Primitive Tribal Groups are characterised by low rate of growth of population, geographically isolated, extremely low level of literacy, besides having other Schedule Tribe attributes of being shy, socially and economically backward. These groups are now referred to as Particularly Vulnerable Tribal Groups (PVTGs).

²³ It is to be noted, that the PS has not been triggered for this project and findings are based on site visit to sample sections of transmission line.

4.2 Land Procurement Reference Framework

This section provides the specific requirements under key legislations applicable for projects' land procurement.

Table 4-2: Land Procurement Reference Framework

S. No	Key aspect of land procurement	Electricity Act 2003	Indian Telegraph Act 1885	Synergies and differences with IFC Performance Standard 5
1.	Land procurement by - transfer of user rights		<p>The act allows taking user rights but not ownership of land for corridors and tower bases for transmission line projects:</p> <p>The Central Government shall not acquire any right other than that of user only in the property under, over, along, across in or upon which the telegraph authority places any telegraph line or post.</p>	<p>Aligned</p> <p>The PS has provisions for land transactions wherein land rights or land use rights are acquired.</p>
2.	Avoidance Criteria	The limitations on acquisition of multi-cropped area under RFCTLARR Act 2013 do not apply to linear projects including those of power lines.	-	<p>Not Aligned</p> <p>Under the PS, client is required to consider feasible alternative project designs to avoid or minimize physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.</p> <p>There is no legal provision under the two acts that align with this requirement of the PS. Considering the scale of land requirement, government has not put any restriction over type of land to avoid for a transmission line project.</p>
3.	Consent	<p>Consent to carry out works: Transmission companies should follow the licensee rules of 2006 for obtaining consent of the owner or occupier of any building or land (u/rule 3(a)) before carrying out works i.e. laying down or place electric supply line or other works related to the same.</p> <p>If the land owners are not willing to let the authority carry out works on their land, the licensee can approach the District Magistrate/Collector with a request to fix compensation under rule 3(b) of 2006 Licensee Rules.</p>	Consent to take land: As long as the telegraph authority does as little damage as possible and pay full compensation to all persons interested in any damages sustained by them due to placement or maintenance of telegraph line or posts, under, over, along, or across an immovable property - the District Magistrate has the authority to permit these activities despite of any resistance or obstruction faced.	<p>Partially Aligned</p> <p>The PS has provisions for land transactions wherein land rights or land use rights are acquired through negotiated settlements with property owners or those with legal rights to the land if failure to reach settlement would have resulted in expropriation or other compulsory procedures.</p> <p>The acts require consent from individual landowner at the time of land procurement, whereas under PS5 only requires FPIC in case of Indigenous Peoples. The act suggests that the project proponent could reach out to government authorities to take land on their</p>

S. No	Key aspect of land procurement	Electricity Act 2003	Indian Telegraph Act 1885	Synergies and differences with IFC Performance Standard 5
				<p>behalf, which is use of expropriation. PS5 recognises such land transactions under negotiated settlement.</p> <p>With respect to the aspect of consent – PS5, refers to informed participation in reference to physical displacement; whereas the acts require consent from all landowners and occupiers, without specifying economic or physical displacement.</p>
4.	Compensation	<p>The licensee shall cause as little damage, detriment and inconvenience as may be, and shall make full compensation for any damage, detriment; as may be determined by the Appropriate Commission.</p> <p>As per removal of difficulties Order dated 28th August 2015²⁴ the provisions of compensation and R&R apply to cases of land acquisition under the Electricity Act 2003. Therefore, any provisions made under Schedule I, II and III for vulnerable groups also apply to vulnerable persons affected by land acquisition for transmission lines.</p>	<p>The telegraph authority shall do as little damage as possible, and, when it has exercised those powers in respect of any property other than that referred to in clause (c), shall pay full compensation to all persons interested, for any damage sustained by them by reason of the exercise of those powers.</p>	<p>Aligned</p> <p>Under PS5, client is to provide displaced persons with compensation for loss of assets at full replacement cost. Where livelihood is land-based or collectively owned, the client will offer land-based compensation.</p> <p>Both acts and PS5 requires project affected persons to be paid full compensation. However, there is a difference in calculation of this amount.</p> <p>The compensation calculated under the act is required to be certain percentage of the market value of the land or asset lost. These values differ state-wise. E.g. in Maharashtra, the compensation varies from 25% of market value to 60% of market value of land depending upon the type of land. In Chhattisgarh, amount equivalent to 50% of market value is payable to an impacted landowner. This rule aligns with the concept of replacement cost under PS5 – mainly because the project is required to pay compensation towards user rights and not for ownership of land.</p> <p>Therefore, market value is incremental in determining the compensation, although the amount of compensation is lesser than the market value.</p>
5.	Titleholders and Non-titleholders	<p>The provisions of consent and compensation are made applicable to owner or occupier of land or building. Both refer to a person in lawful occupation of the building or land.</p>	<p>Compensation is payable to all persons interested, without any specification of title or non-titleholders in the act.</p>	<p>Not Aligned</p> <p>The PS has provisions for land transactions wherein land rights or land use rights are acquired. While some people do not have rights over the land they occupy, their non-land assets are required to be retained,</p>

²⁴ <https://dolr.gov.in/sites/default/files/RFCTLARR%20%28Removal%20of%20Difficulties%29%20Order%2C%202015.pdf>

S. No	Key aspect of land procurement	Electricity Act 2003	Indian Telegraph Act 1885	Synergies and differences with IFC Performance Standard 5
6.	Physical Displacement	<p>In accordance to Government Notification dated 15th October 2015 by Ministry of Power, Government of India²⁵:</p> <p>Only where land is acquired for RoW, the R&R facilities will generally not apply. However the GoI has kept the powers with itself that in case it is required that under Section 98, the R&R facilities can be made applicable.</p>		<p>replaced, or compensated for, and any relocation of such is needed to take place with security of tenure. Loss of livelihoods of such is also to be restored.</p> <p>The Electricity act does not include any provisions for unlawful users of the land or asset; whereas the Telegraph Act requires compensation to be paid to all persons interested, for any damages sustained by them, without distinguishing between title-holders and non-titleholders. Whereas, the PS5 recognises persons without formal legal rights on impacted land or assets as project affected, eligible for compensation.</p>
				<p>Partially Aligned</p> <p>For those physically displaced, the client will offer feasible resettlement options. Forced evictions will not be carried out.</p> <p>The acts by not specifically referring to physical displacements; neither permits nor denies the same. Although due to the nature and scale of transmission line projects, they are not likely to result in physical displacement; if done it falls within the rules of the acts. There are provisions under second schedule of the RFCTLARR Act 2013 that apply to the project affected persons physically displaced by the project.</p> <p>There are both statutory provisions and PS5 requirements for compensation and R&R for physical displaced. However, currently the requirements are not relevant to these projects, since none of them resulted in physical displacement.</p>
7.	Economic Displacement	<p>Where the licensee makes default in complying with any of the provisions of these rules, he shall make full compensation for any loss or damage incurred by reason thereof to the person affected, as may be determined by the District Magistrate or by any other officer authorised by the State Government in this behalf, if not agreed mutually between the parties concerned.</p>	<p>The Magistrate shall, in the case of any tree in existence before the telegraph line was placed, award to the persons interested in the tree such compensation as he thinks reasonable, and the shall be final.</p>	<p>Partially Aligned</p> <p>The client is required to offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods.</p>

²⁵ https://www.mofpi.gov.in/sites/default/files/GUIDELINES_06.11.2015.pdf

S. No	Key aspect of land procurement	Electricity Act 2003	Indian Telegraph Act 1885	Synergies and differences with IFC Performance Standard 5
		Where any difference and dispute arises as to the amount of compensation determined under sub-rule (1), the matter shall be determined by the Appropriate Commission.		<p>Where livelihoods of displaced persons are land-based²⁶, or where land is collectively owned, the client is required to, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available.</p> <p>While both acts and PS5 have provisions towards loss of land and livelihood, Ministry of Power issued a notification²⁷, under which states were vested with the powers to determine compensatory rules for themselves. While some states have made provisions for both land and damage compensation, others have provisions only for damage compensation. This creates inconsistency in legal requirements from state to state.</p>
8.	Vulnerable Groups	As per removal of difficulties Order dated 28 th August 2015 ²⁸ the provisions of compensation and R&R apply to cases of land acquisition under the Electricity Act 2003. Therefore, any provisions made under Schedule I, II and III for vulnerable groups also apply to vulnerable persons affected by land acquisition for transmission lines.		<p>Partially Aligned</p> <p>Under PS5, particular attention is required to be paid to the needs of the poor and the vulnerable.</p> <p>Under the acts, there are no specific measures for land take or compensation towards vulnerable groups affected by the project. Although compensatory measures and R&R measures under Schedule I and II of the RFCTLARR Act 2013 apply to cases of involuntary acquisition; the rule of SIA (wherein vulnerable groups are identified and vulnerability is measured) does not apply to projects under Electricity Act. Therefore, there are challenges in proposing special provisions for the vulnerable impacted by transmission line projects.</p>
9.	Grievance Redressal	<p>Where any difference or dispute [including amount of compensation under sub-section (3)] arises under this section, the matter shall be determined by the Appropriate Commission.</p> <p>The Appropriate Commission, while determining any difference or dispute arising under this section in addition to any compensation under sub-section (3),</p>	<p>If any dispute arises concerning the sufficiency of the compensation to be paid under section 10, clause (d), it shall, on application for that purpose by either of the disputing parties to the District Judge within whose jurisdiction the property is situate, be determined by him.</p> <p>If any dispute arises as to the persons entitled to receive compensation, or as to the proportions in which the</p>	<p>Partially Aligned</p> <p>Under PS5, client is required to establish grievance mechanism consistent with PS 1 to address concerns raised by Project affected peoples.</p> <p>The acts have given responsibility of grievance redressal to the local government bodies, with limited responsibility</p>

²⁶ includes livelihood activities such as subsistence cropping and grazing of livestock as well as the harvesting of natural resources

²⁷ https://www.mofpi.gov.in/sites/default/files/GUIDELINES_06.11.2015.pdf

²⁸ <https://dolr.gov.in/sites/default/files/RFCTLARR%20%28Removal%20of%20Difficulties%29%20Order%2C%202015.pdf>

S. No	Key aspect of land procurement	Electricity Act 2003	Indian Telegraph Act 1885	Synergies and differences with IFC Performance Standard 5
		<p>may impose a penalty not exceeding the amount of compensation payable under that sub-section.</p>	<p>persons interested are entitled to share in it, the telegraph authority may pay into the Court of the District Judge such amount as he deems sufficient or, where all the disputing parties have in writing admitted the amount tendered to be sufficient or the amount has been determined under sub-section (3), that amount; and the District Judge, after giving notice to the parties and hearing such of them as desire to be heard, shall determine the persons entitled to receive the compensation or, as the case may be, the proportions in which the persons interested are entitled to share in it.</p>	<p>given to the project proponent. The project proponent is required to transfer the cost of compensation to the government authorities who will pay compensation to landowners whose land was taken by means of expropriation. With respect to land transactions made by direct negotiation between project proponent and landowners, there is no specific rule for grievance redressal.</p>

4.3 Indigenous Peoples Reference Framework

This section provides synergies between IFC PS 7 with two key legislations pertaining to Indigenous Peoples.

Table 4-3: Indigenous Peoples Reference Framework

Sr N	Performance Standard 7	The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006 and Rules	Panchayats Extension to Scheduled Areas (PESA) Act, 1996	Applicability to Transmission Line Projects
1	<p>Avoidance and Adverse Impacts</p> <p>The client will identify, through an environmental and social risks and impacts assessment process, all communities of Indigenous Peoples within the project area of influence who may be affected by the project, as well as the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage), and environmental impacts on them. Adverse impacts on Affected Communities of Indigenous Peoples should be avoided where possible. Where alternatives have been explored and adverse impacts are unavoidable, the client will minimize, restore, and/or compensate for these impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of the Affected Communities of Indigenous Peoples. The client's proposed actions will be developed with the ICP of the Affected Communities of Indigenous Peoples and contained in a time-bound plan, such as an Indigenous Peoples Plan, or a broader community development plan with separate components for Indigenous Peoples.</p>	<p>Individuals and communities to whom this act applies (i.e. Scheduled Tribes, Other Forest Dwellers, Primitive Tribal Groups, and Pre-Agricultural Community), have rights over land and other resources protected under the law. These are determined by a panchayat level governing body called Gram Sabha²⁹.</p> <p>Forest land means 'land of any description falling within any forest area and includes unclassified forests, protected forests, reserved forests, sanctuaries, and National Parks' (u/s 2(d)).</p>	<p>In the areas defined as fifth scheduled/scheduled V under this act, are covered under special provisions to safeguard and preserve the traditions and customs of tribal communities, their cultural identity, community resources and the customary mode of dispute resolution.</p>	<p>Project at the Planning and Design stage should identify land that does not pass through any type of forest land mentioned in the FRA, does not have forest rights claims on it and does not pass through any Scheduled V area. This can be done with the help of respective Forest Divisions, and List of Scheduled Areas published and updated by Ministry of Tribal Affairs.</p>
2	<p>Participation and Consent</p> <p>The client will undertake an engagement process with the Affected Communities of Indigenous Peoples as required in Performance Standard: * This engagement process includes stakeholder analysis and engagement planning, disclosure of</p>	<p>The Gram Sabha is the competent authority to regulate access to community forest resources and stop any activity, which adversely affects the wild animals, forest, and the biodiversity.</p> <p>Clearance for developmental projects (including</p>	<p>Gram Sabha³⁰ is competent to safeguard and preserve the natural resources located in its area as well as those over which it enjoys traditional rights including water, forest, land and mineral as per local tradition and the spirit of the laws of the Central and State Governments (u/s 31).</p>	<p>In circumstances when diversion of forest land is unavoidable, wherein rights of forest dwellers and other groups mentioned in the FRA are recognised; consultations with the concerned Gram Sabhas is required.</p>

²⁹ Gram Sabha under FRA means a village assembly which shall consist of all adult members of a village and in case of States having no Panchayats, Pa das, Tolas and other traditional village institutions and elected village committees, with full and unrestricted participation of women.

³⁰ Gram Sabha under PESA, similar to the definition in FRA, is comprised of persons whose names are included in the electoral rolls for the Panchayat at the village level.

Sr N Performance Standard 7

The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006 and Rules Panchayats Extension to Scheduled Areas (PESA) Act, 1996

Applicability to Transmission Line Projects

	<p>information, consultation, and participation, in a culturally appropriate manner. In addition, this process will:</p> <ul style="list-style-type: none"> * Involve Indigenous Peoples' representative bodies and organizations (e.g., councils of elders or village councils), as well as members of the Affected Communities of Indigenous Peoples; and * Provide sufficient time for Indigenous Peoples' decision-making processes. 	<p>electrical lines) is subject to recommendations of the Gram Sabha.</p>	<p>In case alienation of land falling under Scheduled V areas is unavoidable for the project development, then recommendation from the Gram Sabha under PESA is required.</p>
<p>3 Requirements of Free, Prior, Informed Consent</p> <p>Affected Communities of Indigenous Peoples may be particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of this Performance Standard, the client will obtain the FPIC of the Affected Communities of Indigenous Peoples in the circumstances described below:</p> <p>(a) Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use;</p> <p>(b) Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use ;</p> <p>(c) Where a project may significantly impact critical cultural heritage of IPs.</p>	<p>For modification or resettlement of recognised forest rights in critical wildlife habitats of National Parks, Sanctuaries, a resettlement or alternative package has to be prepared and communicated to the affected individuals and vetted by Gram Sabha.</p> <p>For diversion of forest land for a transmission line project, in a forest having individual and/or community claims/rights – a clearance from Gram Sabha(s) of village(s) from which the line is proposed to pass, is required (unless the land required is less than one hectare). Process involves:</p> <ul style="list-style-type: none"> - Proposal for diversion of forest land for non-forest use (with full details of the project and its implications in vernacular/local language) to be placed before concerned Gram Sabhas who are eligible under FRA, - Having conveyed full and prior information of the project to be conveyed to the concerned Gram Sabhas, the Gram Sabhas can initiate the process of vesting of individual and community rights, - After all formalities under FRA being carried out, discussion on the proposal in Gram Sabha with at least 50% of members of Gram Sabha present, 	<p>Gram Sabha or the Panchayats at the appropriate level shall be consulted before making the acquisition of land in the Scheduled Areas for development projects and before re-settling or rehabilitating persons affected by such projects in the Scheduled Areas.</p> <p>Process:</p> <ul style="list-style-type: none"> - Proposal submitted to concerned Gram Sabha regarding proposed land acquisition, along with written information on (i) complete outline of proposed project including possible impact of the project, (ii) proposed land acquisition, (iii) any new persons likely to settle in the village and possible impact on the area and society, (iv) proposed participation, amount of compensation, and job opportunities for the people of the village, - Gram Sabha after review of the proposal in a quorum³¹ specified by the state-level PESA Rules, shall pass a resolution to give permission for the project or not. 	<p>In case the project results in displacement of persons covered under FRA, a Free Prior Informed Consent should be obtained from concerned Gram Sabhas, in writing for the proposed resettlement and the packages offered.</p> <p>Before acquisition of land in Scheduled V areas, the project must consult with the concerned Gram Sabha or Panchayat under PESA act.</p>

³¹ Quorum of the Gram Sabha will be as per State PESA Rules, State Panchayati Raj Acts and State Panchayati Raj Rules. For example, in Rajasthan quorum is 10% of total members of Gram Sabha. In Andhra Pradesh, the quorum is not less than 1/3rd of members of Gram Sabha of whom at least 50% shall be ST members. In Maharashtra, the quorum is twenty-five per cent of the total members or one hundred, whichever is lower.

Sr N Performance Standard 7

The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006 and Rules

Panchayats Extension to Scheduled Areas (PESA) Act, 1996

Applicability to Transmission Line Projects

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- If Gram Sabha agrees to the purpose of diversion, a written consent to be given along with any compensation and ameliorative measures is given.

The acts consider Scheduled Tribe, Forest Dwellers, Pre-Agriculturalist Communities, and Primitive Tribal Groups (Particularly Vulnerable Tribal Groups) all as Indigenous; aligning with definition of Indigenous Peoples' under PS7. Both PS7 and the acts give decision-making powers to IPs with respect to alienation of their land, restrictions over their access to individual and community resources. However, the acts give specific requirements of obtaining permission from IPs, while PS7 acts more like a guideline.

4.4 Status of Key Permits and Licenses

The status of key E&S permits for the Project assets are listed in table below.

Table 4-4: Environment and Social Permits and License

S. No.	Legal Requirement	Issuing Authority	Permit Status				
			JTCL	MTL	PKTCL	RTCL	OGPTL
1.	Environment Clearance (EC)	Ministry of Environment, Forest & Climate Change (MoEF&CC)	Not applicable for power transmission projects, as per EIA Notification, 2006				
2.	Forest Clearance (FC), under Forest Conservation Act, 1980	Ministry of Environment, Forest & Climate Change (MOEF&CC). State Chief Conservator of Forests	<p>Stage 2 Issued via letter F.No. 8-100/2014-FC dated 16.03.2015; for diversion of 138.31 ha of forest land for construction of 765 kV D/C Jabalpur - Bina Transmission Line in the state of Madhya Pradesh</p> <p>Stage 2 Issued via letter F.No.8 – 96/2014- FC, dated 10.03.2015; for diversion of 238.818 ha of forest land for construction of 765 kV D/C Dharamjalgarh - Jabalpur Transmission Line (in Jabalpur, Mandla and Dindori Districts)</p>	<p>Stage 2 issued via letter F.No.4-TSC022/2016-CHN/0069 dated 12.01.2018 for diversion of 15.625 ha of forest land for the erection of 400 kV D/C Nizamabad - Yeddumailaram Transmission line at Nizamabad to the existing 400/200 KV SS of TRANSCO.</p> <p>The compliance document on conditions was not available for review.</p>	<p>Stage 2 issued via letter No. FP/JH/TRANS/ 14843/2014/1872, dated 09.01 .2018 for diversion of 33.484 ha of forest land for the construction of 400 kV D/C Kharagpur – Chaibasa Transmission Line in Seraikela and east Singhbhum district of Jharkhand.</p> <p>Stage 2 issued via letter No. 9241/L&LT2M/1073 /2014, dated 04.01 .2019 for diversion of 12.288 ha of forest land for the construction of 400 kV D/C Purulia - Ranchi Transmission Line.</p>	<p>Stage 2 Issued via letter F/14/2014/ FCA// 5744, dated 24.08.2015; for diversion of 27.37 ha of forest land for construction of 400 kV D/C RAPP to Shujalpur Transmission Line.</p> <p>The compliance document on conditions was not available for review.</p>	<p>Stage 1 – In Principle – issued via letter FC-III/CH-21/2017-NGP/2756, dated 17.10.2017, for diversion of 71.761 ha of forest land for construction of 765 D/C Transmission Line in Jharsuguda (Sundergarh – Raipur Pooling Station)</p> <p>Stage 1 – In Principle – issued via letter-No. 5-ORA334/2018-BHU, dated 06.03.2018, for diversion of 20.8ha of Jamkhani Reserved Forest, 16.08ha of Demarcated Protected Forest, 3.67ha DLC Land and 54.08 ha of Revenue forest; for construction of 765 kV D/C Transmission line in Sundergarh, Odisha to Raipur Pool.</p> <p>The compliance document on conditions was not available for review.</p>

S. No.	Legal Requirement	Issuing Authority	Permit Status					
			JTCL	MTL	PKTCL	RTCL	OGPTL	
			<p>Stage 2 Issued via letter F.No.8 – 97/2014- FC, dated 18.06.2015; for diversion of 113.678 ha of forest land for construction of 765 kV D/C Dharamjaigarh - Jabalpur Transmission Line (in Korba district of Chhattisgarh)</p> <p>The compliance document on conditions was not available for review.</p>		<p>Stage 2 issued via letter No. FP/JH/TRANS/ 14842/2014/4578, dated 22.03.2021 for diversion of 59.501 ha of forest land for the construction of 400 kV D/C Ranchi - Purulia Transmission Line in Khunti and Ranchi district of Jharkhand.</p>			
					<p>Stage 2 issued via letter No. 10488/L&LT2M-1073/2014, dated 05.02.2019 for diversion of 10.59 ha of forest land for the construction of 400 kV D/C Kharagpur - Chaibasa Transmission Line in kharagpur Forest division</p> <p>The compliance document on conditions was not available for review.</p>			
3.	<p>Transmission Licence, under Section 14 of the Electricity Act, 2003 (36 of 2003).</p> <p>/ Power Evacuation Agreement</p>	Central Electricity Regulatory Commission	<p>Transmission licence issued to JTCL for establishment of Transmission Line; Licence No. 16/Transmission /2011/CERC , dated 05.09.2011.</p> <ul style="list-style-type: none"> Dharamjaigarh-Jabalpur pool 765 kV, D/C Transmission line (ACSR/AAC ZEBRA). Jabalpur pool -Bina 765 kV Quad S/C transmission line (ACSR/AAAC bersemis). 	<p>Transmission licence issued to MTL for establishment of Transmission Line - Licence No. 36/Transmission /2015/CERC dated 23.10.2015.</p> <ul style="list-style-type: none"> Maheshwaram - Mehboob Nagar 400 kV, D/C Transmission line. 2 No. of 400 kV line bays at Mehboob nagar sub-station of TSTRANSCO Transmission licence provided for Nizamabad - Yeddumailaram (Shankarpalli) 400 kV, D/C Transmission line 2 No. of 400 kV line bays at Yeddumailaram 	<p>Transmission licence issued to PKTCL for establishment of Transmission Line - Licence No. 25/Transmission /2014/CERC dated 30.04.2014.</p> <ul style="list-style-type: none"> Purulia PSP (WB) -Ranchi (PG) 400 kV, D/C Transmission line. Kharagpur (WBSETCL) - Chaibasa (PG) 400 kV, D/C Transmission line. 	<p>Transmission licence issued to RTCL for establishment of Inter-state Transmission System - Licence No. 28/Transmission /2014/CERC dated 31.07.2014.</p> <ul style="list-style-type: none"> RAPP – Shujalpur 400 kV D/C Transmission Line (Twin Moose ACSR / AAAC). 	<p>Transmission licence issued to OGPTL for establishment of inter-state Transmission System – Licence No. 42/Transmission /2016/CERC dated 30.06.2016. Jharsuguda (Sundargarh) – Raipur Pool 765 kV D/C line (Hexa Zebra Conductor). OPGC – Jharsuguda (Sundargarh) 400 kV D/C (Triple Snowbird Conductor).</p>	

S. No.	Legal Requirement	Issuing Authority	Permit Status				
			JTCL	MTL	PKTCL	RTCL	OGPTL
			(Shankarpalli) sub-station of TSTRANSCO				
4.	No Objection Certificate for the Project	Village Panchayat	Not Applicable for the project, as there is no substation within asset scope	Not Applicable for the project, as there is no substation within asset scope	Not Applicable for the project, as there is no substation within asset scope	Not Applicable for the project, as there is no substation within asset scope	Not Applicable for the project, as there is no substation within asset scope
5.	Transmission Line Service Contract	-	Transmission Service Agreement signed between "Long Term Transmission Customers" and JTCL for procurement of Transmission Services.	Transmission Service Agreement signed between "Long Term Transmission Customers" and MTL for procurement of Transmission Services. Dated 10.06.2015. Total percentage of transmission charges payable to the provider on commissioning/COD of the element: <ul style="list-style-type: none"> 35% for Maheshwaram Mehboob nagar 400kV D/C line. 65% for the Nizamabad - Yeddumailaram 400kV D/C line. 	Transmission Service Agreement signed between "Long Term Transmission Customers" and PKTCL for procurement of Transmission Services. Dated 06.08.2013.	Transmission Service Agreement signed between "Long Term Transmission Customers" and RTCL for procurement of Transmission Services. Dated 07.2013.	Transmission Service Agreement signed between "Long Term Transmission Customers" and OGPTL for procurement of Transmission Services. Dated 17.05.2015.
6.	Annual Maintenance Agreements	-	Transmission Line Maintenance Services Agreement was signed between JTCL and Telegence Powercomm Private Limited, dated 01.10.2020. The Contract is valid for 3 years, with extension option of up to 2 years. The contract covered scope of services, warranty, and occupational safety of contractors for the maintenance activities.	Transmission Line Maintenance Services Agreement was signed between MTL and JBS Enterprises Pvt Ltd, dated 08.02.2021. The Contract is valid for 3 years, with extension option of up to 2 years. The contract covered scope of services, warranty, and occupational safety of contractors for the maintenance activities.	Transmission Line Maintenance Services Agreement was signed between PKTCL and JBS Enterprises Pvt Ltd, dated 25.01.2017. The Contract is valid for 3 years, with extension option of up to 2 years. The contract covered scope of services, warranty, and occupational safety of contractors for the maintenance activities.	Transmission Line Maintenance Services Agreement was signed between RTCL and Yashmun Engineers Ltd, dated 20.05.2016. The Contract is valid for 3 years, with extension option of up to 2 years (upon review of performance). The contract covered scope of services, warranty, and occupational safety of contractors for the maintenance activities.	Transmission Line Maintenance Services Agreement was signed between OGPTL and JBS Enterprises Pvt Ltd, dated 21.02.2018. The Contract is valid for 3 years, with extension option of up to 2 years (upon review of contractor's performance). The contract covered scope of services, warranty, and occupational safety of contractors for the maintenance activities.

S. No.	Legal Requirement	Issuing Authority	Permit Status				
			JTCL	MTL	PKTCL	RTCL	OGPTL
7.	Permission for Ground water abstraction	Central Ground Water Authority (CGWA)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
8.	Permission for water consumption (operation phase)	-	Not Applicable. IndiGrid has reported that bottled water is being purchased for drinking purposes.	Not Applicable. IndiGrid has reported that bottled water is being purchased for drinking purposes.	Not Applicable. IndiGrid has reported that bottled water is being purchased for drinking purposes.	Not Applicable. IndiGrid has reported that bottled water is being purchased for drinking purposes.	Not Applicable. IndiGrid has reported that bottled water is being purchased for drinking purposes.
9.	Principal Employer's Certificate Under rule 18(1) of the Contract Labour (Regulation and Abolition) Central Rules, 1971	Ministry of Labour and Employment Office of the Regional Labour Commissioner	Certificate No. CLRA/RLCBILASPUR/ 2020/R-2, dated 30.06.2020 issued to JTCL, with O&M contractors (JBS) listed. Certificate No. J-46 (2-4)/2012-ALC, dated 08.09.2021 issued to JTCL, with details of contractors listed.	Certificate No. 58/07/2015-E3/E5, dated 31.12.2020 issued to MTL, with details of contractors listed.	Certificate No. 46/ 1(01)/2015-RLC(R), dated 15.01.2015 issued to PKTCL (as the Principal Employer), and with details of contractors listed.	Amended Certificate No. RLC-46/ 1(17)/2014, dated 04.08.2021 issued to RTCL (as the Principal Employer), with details of contractors listed.	Certificate No. RP-55(05)/ 2016-ALC, dated 10.02.2021 issued to OGPTL (as Principal Employer), with details of O&M contractor listed.
10.	Labour License	Ministry of Labour and Employment Office of the Regional Labour Commissioner (Central)	Licence No: CLRA/ALCJABALPUR/2021/L-270 dated 24.12.2021 issued to Telegance Powercomm pvt ltd. Valid upto 23.12.2022 for upto 100 employees on a day	Not applicable. Number of workers are within the limit of license eligibility.	Licence No. CLRA/ALCKOLKATA/ 2021/ L-209, dated 20.09.2021, issued to JBS Enterprises pvt ltd, valid up to 19.09.2022, for up to 27 contract employees per day.	License to be obtained by the contractor.	Licence No. CLRA/RLCBILASPUR/ 2021/ L-77, dated 17.03.2021, issued to JBS Enterprises pvt ltd, valid up to 16.03.2022, for up to 30 contract employees per day.
11.	Electrical Contractor's Licence	State Electrical Licensing Board	Information not available for review	Permit TI-220, issued to JBS Enterprises, authorized to carry out electrical works of electrical installations (above 132 kV), under regulation 33(C) of Telangana State Electrical Licensing Regulations 2018; Valid from 21.05.2020 to 20.05.2022.	Information not available for review	Information not available for review	Information not available for review
12.	Certificate to engage Migrant Workmen, as per Inter-state migrant workers Act, 1979.	Department of Labour	Declaration by Telegance Powercomm, dated 19.11.2021 No Inter-state migrant workers included. However, records show engagement of migrant workers.	Doc: JBS/HR/ 21-22/ 2111699, dated 30.11.2021 No Inter-state migrant workers included. However, records show engagement of migrant workers.	Doc: JBS/HR/ 21-22/ 2111703, dated 30.11.2021 No Inter-state migrant workers included.	No application or certificate of registration under the act available for review. Records show engagement of migrant workers.	The asset's contractual workforce includes inter-state migrant workman. Contractor needs to obtain a labour license under the act.

S. No.	Legal Requirement	Issuing Authority	Permit Status				
			JTCL	MTL	PKTCL	RTCL	OGPTL
13.	Approval for Crossings - Highway	National Highways Authority of India, Regional Road Development Corporation Ltd	<p>Approval of proposal for crossing of 765 kV S/C Jabalpur to Bina transmission line over NH12 between Jabalpur and Bina.</p> <hr/> <p>NHAI/RO-MP/SAG /NOC/2013/11320 dated 27.05.2013</p> <p>Permission for crossing of 765KV D/C Jabalpur transmission line over NH 26.</p> <hr/> <p>IndiGrid has shared approvals for 4 additional road crossings with AECOM for review.</p>	<p>Ref. SR-1/Engg-TL/State-Trnsco/Clearance/282 dated: 08.12.2016</p> <p>Construction of 400kV D/C Maheshwaram – Mehboob Nagar transmission line of MTL, powerline crossing of 765KV D/C Maheshwaram - Nizamabad.</p>	<p>Ref: NHAI/ PIU/PD/JSR/camp Ranchi/171 dated 05.11.2015</p> <p>Permission granted for the overhead powerline crossing proposal of NH-6, Kharagpur to Behragora.</p>	<p>NHAI/PIU-GUNA/NH-3 /HT lines/9385, dated 07.10.2015; Conditional permit for crossing of 400 kV D/C twin from RAPP Rawatbhata to Shujalpur line over NH-3. Approval subject to obtaining Forest Clearance, damage of highway property and safety of users / traffic movement.</p>	<p>No.RO/NH-200/44/8/OGPTL/2017-18/01/839, DATED 05.03.2018; Approval to the power line crossing of 765kv Sundargargh (Jharsuguda)-Raipur D/C TL of OGPTL over NH-200 (Raipur – Bilaspur).</p> <hr/> <p>Approval of power line crossing of 765 kV Sundargargh – Raipur D/C transmission line of OGPTL over NH-49 in between milestone no. 138-139 near Dushkela at village Madanpur of Tehsil Kharsia in District Raigargh.</p>
Approval for Crossings - Powerline	State / Regional Electricity Transmission Co. Ltd.	<p>Ref: WR-II/DAMOH/SS/7050 dated 15.01.2013</p> <p>Approval of 400 KV D/C Damoh-Bhopal Line Crossing by 765 kV S/C Bina- Jabalpur line.</p> <hr/> <p>Ref No.: 04-02/B-2531/P&D-TLD/1513, dated 30.05.2013</p> <p>Approval on the crossing proposal of 132KV Jabalpur-Narsinghpur line of MPPTCL by proposed 765 Kv D/C</p>	<p>Ref: SR-1/Engg-TL/State-Trnsco/Clearance/300 dated: 23.01.2017</p> <p>Construction of 400KV D/C Nizamabad-Shankarpalli Transmission lines of MTL, Powerline crossing of 765 D/C Maheshwaram – Nizamabad.</p>	<p>Ref.No. ER – I/JSR/J-B/ XING/PKTCL/ 2912, dated 04.12.2015. NOC issued for overhead crossing of 400 kV D/C Jamshedpur- Baripada TL in between tower no. 279 & 280 of PowerGrid Corporation by 400 kV D/C Kharagpur – Chaibasa transmission line.</p> <hr/> <p>No. EDCON/SPE/ Line Crossing/1221, dated 30.12.2015 Approval of overhead crossing of 220 kV S/C Jamshedpur – Joda Transmission Line by the 400 kV D/C Kharagpur – Chaibasa Transmission Line</p>	<p>WR-II/SJP/SS/913, dated 29.07.2015; Conditional approval for power line crossing (overhead) of RTCL 400 kV D/C RAPP (KOTA) – Shujalpur TL with POWERGRID 400 kV D/C Shujalpur – Nagda TL.</p> <hr/> <p>SE/EHT-Maint/ Works/Bp/76, dated 08.05.2015; Approval for crossing of 220 kV Shujalpur – Rajgarh and 132 kV Sarangpur -Khilchipur line of MPPTCL by proposed 400 kV RPP to Shujalpur TL of RTCL.</p>	<p>Approval of power line crossing of 765 kV Sundargargh – Raipur D/C transmission line of OGPTL over NH-49 in between milestone no. 138-139 near Dushkela at village Madanpur of Tehsil Kharsia in District Raigargh.</p> <hr/> <p>Ref.No. ED/EHT: C&M/Works/ 1870, dated 05.10.2016; Approval for EHV power line overhead crossing of 765 kV D/C Sundargargh-Raipur TL of OGPTL with existing 400 kV S/C Khedamara – Raita (Raipur) line of CSPTCL.</p> <p>IndiGrid has shared approvals for 2 additional powerline crossings with AECOM for review.</p>	

S. No.	Legal Requirement	Issuing Authority		Permit Status		
		JTCL	MTL	PKTCL	RTCL	OGPTL
		IndiGrid has shared approvals for 19 additional power line crossings.		IndiGrid has shared approvals for 11 additional power line crossings.	Approval for proposed 400 kV D/C TL twin from RAPP Rawatbhata to Shujalpur power line crossing over to RRVPNL Transmission Lines.	
Approval for Crossings - Railway	Indian Railways / Central/ Regional Railway	Permission granted for crossing of proposed 765 KV D/C transmission line (AP No. 6/0-7/0) between three different lines. Dated 22.02.2013	No. RW/HYD/Misc.-24(D)/Utility Services/1996 dated: 03.03.2017 Installation of 400KV D/C Twin transmission lines from Maheshwaram to Mehboob nagar transmission lines overcrossing in between km 37 and km 38 of NH-765 (Hyderabad – Kalwakuthy section)	Letter No. CKPD.229/HLD-BDO/400KV-PKTCL dated: 17.02.2016 Permission for stringing of 400kV D/C overhead powerline crossing in between Haludpukur-Bahalda railway station, at km.no.281/7-9 in Chakradharpur division (non-electrified section)	No.EL/TR/94/9/36 (2015), dated 21.04.2015; Approval for crossing of 400 kV D/C RAPP – Shujalpur line between Ramganjmandi – Jhalawar Track crossing, Nagda -Kota section rail path	No. EL/G/R/765 kv-oh x-ING/Odisha Gen/ HN-BYT/16/02/1615, dated 11.12.2017; Approval of 765 kv Overhead power line crossing of OGPTL in between Hathbandh and Bhatapara stations.
		No. EL/G/BSP/JTCL/URGA-SRBA/Final App./EIG/16/2021 dated 05.01.2016 Final approval for erection of proposed 765 KV D/C overhead power line crossing between Urga & Saragbundia Railway station.		Permit. No: EL/(D)/ RNC/16/4, dated 08.07.2016; Approval of proposed PKTCL's 400 kV D/C Purulia – Ranchi Transmission Line crossing over electrified track between Suisa – Torang stations at km 333/3 – 333/4 on MURI-CNI section of Ranchi division.	No.BPL/W/3406/wayleave, dated 23.01.2015; Permission for laying of 400kV D/C twin transmission line overhead of track at kms.1240/1-2 on RTA-MKC section for RTCL, Rajgarh (Biaora)	No. EL/G/R/765 kv-oh x-ING/Odisha Gen/ BYT-Ambuja /2016/04, dated 11.12.2017; Approval of 765kV overhead power line crossing of OGPTL in between Bhatapara Railway station and Ambuja cement plant.
		IndiGrid has shared 1 permit for Dipka – NTPC Sipat, Ghutku – Kalmitkar railway crossings for review.		Permit. No: EL/(D)/ RNC/16/5, dated 08.07.2016. Approval of proposed PKTCL's 400 kV D/C Purulia – Ranchi Transmission Line over electrified track between Lodhma – Balsiring stations at km 437/11 – 437/12 in THE- NXN section.		

4.5 Indigenous Peoples – Permissions and Consent

Any project with potential impact on land, user rights, and socio-economic interests of the Scheduled Tribe community (defined under Articles 342 and 366 of Indian Constitution), needs to comply with a set of laws. They are follows:

- a) The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006 and Rules;
- b) Panchayats Extension to Scheduled Areas (PESA) Act, 1996;
- c) Scheduled Castes/Scheduled Tribes (Prevention of Atrocities) Act, 1989 and Rules 1995;
- d) Right to Fair Compensation and Transparency in Land Acquisition, Resettlement and Rehabilitation Act 2013;
- e) Wildlife (Protection) Act 1972 and Amendment Act 2002.

Table 4-5: Legal framework for Scheduled Tribes

Sr N	Indian Law	Requirements for Schedule Tribes	Applicability to Projects
1	Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006 and Rules	<p>Includes procedures to recognise and settle individual as well as community forest rights.</p> <p>Includes provisions for 'Free Informed Consent' of the Gram Sabhas for resettlement where Scheduled Tribes are either evicted or their access to forest resources is restricted.</p> <p>Recognises rights of forest dwelling Scheduled Tribes on community tenures of habitat and habitation for primitive tribal groups and pre-agricultural communities (u/s 3(e)).</p>	<p>There are forest dwellers in and around all 4 project sites, which has triggered the need to recognise and settle their rights. These include, Gaud, Santhali, Munda and Ho tribes, among others. Gram Sabha's free prior informed consent is mandatory to be obtained before constructing the project infrastructure.</p> <p>FRA certificates shared for review for 3 sites (JTCL, MTL, and PKTCL) show a contradiction of rules made applicable while obtaining the certificate. Therefore, details of consultations undertaken are requested to verify the process carried out to obtain these certificates and assess its compliance to the act.</p>
2	Panchayats Extension to Scheduled Areas (PESA) Act, 1996	<p>Gram Sabha or the Panchayats at the appropriate level shall be consulted before making the acquisition of land in the Scheduled Areas for development projects and before re-settling or rehabilitating persons affected by such projects in the Scheduled Areas</p> <p>Gram Sabhas have the power to prevent alienation of land and to restore unlawfully alienated land of a Scheduled Tribe. And the Gram Sabhas have the ownership over minor forest produce (under Part-IX).</p>	<p>JTCL, PKTCL and OGPTL project sites pass through Schedule V areas, therefore, requiring a Gram Sabha resolution to procure land within Scheduled V area and to take actions recommended by the Gram Sabha to protect their natural resources.</p> <p>Presently, it is not known if the Project proponents of JTCL, PKTCL, and OGPTL have consulted the concerned Gram Sabhas and obtained their resolution. In the absence of documentation, confirmation from locals and government officials regarding gram sabha under PESA being held would have helped conclude this point. However, during consultations government officials and locals did not seem to be aware of gram sabhas being organised for the project.</p>
3	Scheduled Castes/Scheduled Tribes (Prevention of Atrocities) Act, 1989 and Rules 1995	<p>Includes prevention measures against atrocities on persons belonging to Scheduled Tribe communities. Offenses may include wrongful dispossession of a member of Scheduled Tribe community from their land or premises or interference with the enjoyment of their rights over any land, premises or water (u/s 3(1)(v)).</p>	<p>During on-site consultations with representatives from Scheduled Tribe communities, across all sites, it was understood that the Project has not interfered with their enjoyment of rights over their land and common natural resources so far. There are Scheduled Tribe landowners impacted by the project for MTL and PKTCL. Consultations with few indicates that they were paid compensation at the market rate for all damages caused.</p> <p>The Santhali tribes worshipping the Sarna sacred groves in PKTCL, reported to have continued access to the groves.</p>

In general persons belonging to Scheduled Tribe community consulted during the site visit, reported to have continued access to the natural resources.

4	Right to Fair Compensation and Transparency in Land Acquisition, Resettlement and Rehabilitation Act 2013	<p>Includes special provisions for persons belonging to Scheduled Tribe community (u/s 41).</p> <p>* In case of alienation of any land in Scheduled Areas, the 'prior consent' from concerned Gram Sabha is required to be obtained.</p> <p>* In case of involuntary displacement of the Scheduled Tribe families, a Development Plan shall be prepared for settlement of their land rights. The Development Plan shall also contain a programme for development of alternate fuel, fodder and non-timber forest produce resources on non-forest lands within a period of five years sufficient to meet the requirements of the tribal communities.</p>	<p>Land records and on-site consultations show that land has been procured from Scheduled Tribe landowners for MTL, PKTCL, and OGPTL projects. The consulted landowners reported to have balance land under their ownership after giving a section of it for the project.</p> <p>The limited consultations also indicate that ST landowners provided consent to take their land for the project and involuntary displacement was not carried out. Therefore, the statutory need for Development Plan is not triggered. The need for this has not been triggered, based on information available to us on ST land take for projects. Land procurement for all these assets was done post 2013.</p>
5	Wildlife (Protection) Act 1972 and Amendment Act 2002	<p>A 'community reserve' (u/s 36(c)) is a type of Protected Area under the act. The act gives power to the State Government to declare any private or community land as community reserve where the community or an individual has volunteered to conserve wild life and its habitat.</p> <p>The act prevents any land use changes to be made in the community reserve, unless it is passed by a resolution by its Management Committee and approval on it by the respective State Government.</p>	<p>Consultations with Forest Department representatives and locals belong to Scheduled Tribe community, it is understood that the Sama sacred groves in the region are not declared as community reserve and there is no Management Committee in existence. Therefore, the statutory requirement of resolutions under the act do not apply at this stage to the PKTCL project.</p>

5. Project Screening and Gap Assessment against IFC Performance Standards Framework 2012

Based on the overview of project description and the environmental and social context described in *Section 4* of this report, the following IFC Performance Standards (2012) were observed to be applicable to the projects which were visited:

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts – All sites
- PS 2: Labour and Working Conditions - All sites
- PS 3: Resource Efficiency and Pollution Prevention - All sites
- PS 4: Community Health, Safety and Security - All sites
- PS 5: Land Acquisition and Involuntary Settlement - All sites
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources – All sites
- PS 7: Indigenous Peoples – All sites
- PS 8: Cultural Heritage – Not applicable as the selected Transmission Lines have either avoided or are not routed close to any Cultural Heritage sites,

IFC List of Excluded Facilities: None of the activities that are carried out by client under review were assessed to trigger the exclusion list.

The compliance status of gaps are categorised as red, orange and yellow flag issues and the priority category as High, Medium and Low on the basis of the severity of the EHS and Social related risks and implication on the project:

Priority	Indicator flag	Remarks
High	Red Flag Issues	These are observations which pose high impact on the environment, health, safety and social aspects and may have legal implications.
Medium	Orange Flag Issues	These are observations which pose moderate impact on the environment, health, safety and social aspects.
Low	Yellow Flag Issues	These are observations which pose low or least impact on the environment, health, safety and social aspects.

5.1 Assessment for IFC Performance Standards, 2012 for IndiGrid at Corporate Level

Table 5-1: Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
IFC PS-1: Assessment and Management of Social & Environmental Risks and Impacts				
1.	<p>Environment and Social Management System (ESMS)</p> <p>The Client will conduct a process of environmental and social assessment and establish and maintain an ESMS appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts. The ESMS will incorporate the following elements,</p> <ul style="list-style-type: none"> • Policy • Identification of Risks and Impacts • Management Programs • Organizational Capacity and Competency • Emergency Preparedness and Response • Stakeholder Engagement • Monitoring and Review • External Communication and Grievance Mechanism 	<ul style="list-style-type: none"> • IndiGrid has established Environmental and HSE management systems and certified with Integrated Management System comprising of: <ul style="list-style-type: none"> ○ ISO 9001:2015 certified by Bureau Veritas Certification for Management of assets including operation and maintenance of EHV transmission line and substations, technical support, merger, and acquisition, legal, finance, Human resources, Health Safety and Environment quality, procurement, regulatory and contracts administration and information technology. The certificate is valid till 07th April 2024. ○ ISO 14001:2015 certified by Bureau Veritas Certification. The certificate is valid till 07th April 2024. ○ ISO 45001: 2018 certified by Bureau Veritas Certification. The certificate is valid till 07th April 2024. • The company has a dedicated Environmental and Social Management (ESMS) in place, applicable to all the currently operating assets of IndiGrid, in addition to assets considered for future acquisition. IndiGrid had engaged third party consultant for development of their ESMS. • The ESMS outlined also IndiGrid's approach and commitment to deal with environmental and social issues, relating to its transmission Line (TL), and lays out management procedures and protocols to mitigate the same. • The ESMS also defined relevant good international industry practices (GIIP) so as to mitigate the risks at every stage of the project. The ESMS document comprises of the following sections: <ul style="list-style-type: none"> ○ Environmental and Social Policy ○ Environmental and Social Governance ○ Asset screening and acquisition ○ Environmental and Social Management and Monitoring ○ Performance and evaluation ○ Disclosure and external reporting ○ Training and Capacity Building • The document provides detailed insight on ESMS implementation, across the asset lifecycle – Asset Acquisition, HOTO stage, Asset Operation and Management, Overall Performance Review, Disclosure and Reporting, Training and Capacity building, ESMS Review and updating. Key tasks to identify E&S risks at every stage have been listed in the ESMS. Standard 	<ul style="list-style-type: none"> ○ IndiGrid should develop Operation and Maintenance manual for substation equipment and EHV Transmission Line includes: <ul style="list-style-type: none"> - Maintenance of EHV sub-grid - Maintenance for EHV transformers, circuit breakers - Maintenance for protection and metering and switch yard and equipment - Earthing and maintenance schedule 	Medium

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		<p>Operating Procedures, individual reporting formats have been included as Appendices in the ESMS.</p> <ul style="list-style-type: none"> • IndiGrid at the corporate level have established a HSE Policy, applicable for all their operating assets and details on the policy format and framework have been included as an Appendix to the ESMS. In particular IndiGrid HSE policy outlines its committed to ensure Zero Harm to people, environment and community by adopting best in class processes and driving risk based HSE culture across the organization and its stakeholders. An approved copy of the HSE Policy, signed by their CEO, has been displayed on all their site offices. • IndiGrid has developed Health, Safety & Environment (HSE) Manual as per the requirement of ISO 45001: 2018. The corporate manual was developed in August 2020 and has been approved by an authorized signatory from IndiGrid. The manual containing all the tools, methodologies and best practices needed to execute on a day-to-day basis as well as those needed to drive and deliver improvements in Operation and Maintenance of project. Procedures on various aspects of environment, health and safety, which have been developed as part of the manual, are mentioned: <ul style="list-style-type: none"> ○ PPEs ○ Job Safety Analysis ○ Legal Compliance ○ HSE Orientation and Training ○ Driving Safety ○ Working at Height ○ Electrical Safety Management ○ LOTO ○ Material Handling ○ Fire Safety Management ○ Excavation ○ Aspect Identification ○ Hazard Identification and Risk Assessment • Plans for Stakeholder engagement, Grievances Redressal, have been developed as a part of their ESMS. • IndiGrid at Corporate level has a Code of Ethical Business Conduct. The provisions under this Policy are applicable to Company's competitors, customers (along with its employees). The policy covers elements of Whistle Blower, Anti-discrimination, Equal Opportunities, Social Media Communication, Anti-Corruption, Aspects of behavioural at work among others. 		
2.	Policy: The Client will establish an overarching policy defining	<ul style="list-style-type: none"> • IndiGrid has developed HSE Policy dated 25th August 2020, as approved by the Chief Executive Officer of the company, Mr. Harsh Shah. 	<u>All Sites</u>	-

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	<p>the environmental and social objectives and principles that guide the project to achieve sound environmental and social performance.</p>	<ul style="list-style-type: none"> • IndiGrid HSE policy highlighted its committed to Adopt and Implement best in class practices across organization, conduct robust Hazard Identification and Risk Mitigation for all activities, minimizing impact to environment and community, abide by the law of the land and regulations, create safety First culture and promote occupational health and Continuously Improve and sustain. • The overarching Environmental and Social Policy governs the E&S performance of the Company mainly at Corporate level. Different elements of this Policy are applicable to different internal and external stakeholders including project affected entities, contractors, workers, communities, employees among others. • Specifically, in terms of social commitment, the E&S Policy identifies the need for a formal Stakeholder Engagement and Grievance Redressal system to all its stakeholders, and Human resource management policies that also recognize safeguards for workers engaged. • The Policy suggests undertaking E&S Due Diligence, Impact Assessment studies for all IndiGrid assets, including those at O&M stage. It recognizes some reporting and disclosure mechanisms towards different stakeholders, which is covered under Stakeholder Engagement section of this Table. • The Policy suggests adequate staffing for E&S roles; by suggesting formation of an ESMS Committee, E&S monitoring responsibilities for existing personnel/teams such as Board of Directors, Asset Acquisition, Regional Heads, Project Managers, Human Resource & Administration Departments, among others. <p><u>All Sites</u></p> <p>The Corporate level Environmental and Social Policy is applicable to all IndiGrid's assets. The systems recommended under Corporate ESMS have asset level procedures, plans, and mechanisms.</p>	<ul style="list-style-type: none"> • Develop a site-specific SEP and GRM, in conjunction with the Corporate level SEP and GRM. Ensure it is contextualised to the stakeholders relevant to the project and communicate provisions under the plan with respective stakeholders through written communication. • IndiGrid will have a grievance mechanism for the local community in its assets. This community GM will allow all grievances to be registered including those related to their ongoing operations as well as those related to past claims and compensation related to the LA and use of the RoW. Where IndiGrid is responsible for the impact, it will resolve the issue/concern and mitigate the impacts based on principles defined in PS 5. For legacy impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people). The Grievance mechanism will be provided in the IndiGrid website with appropriate details and guidance, along as well as a phone number to use to register any grievances. Affected communities/stakeholders will be made aware of the grievance mechanism (access, function, etc.) through ongoing stakeholder engagement as well as information provided at each of the site office notice boards. IndiGrid will regularly monitor the status of all grievances at an asset level and cumulatively at IndiGrid level. EHS and Social Manager as well as O & M contractor will be adequately trained on Grievance Management. 	
3.	<p>Identification of Risks and Impacts: The client will establish and maintain a process for identifying the environmental and social risks and impacts of the project. The type, scale, and location of the project guide the scope and level of effort devoted to the risks and impacts identification</p>	<ul style="list-style-type: none"> ○ IndiGrid has developed a Corporate Level HIRA for all its business lines, which have been observed to be communicated at the asset level. This format for HIRA has been included as an Appendix in IndiGrid's ESMS and is being used for all assets. ○ Further, the ESMS directs every asset IndiGrid to maintain a risk register (ongoing basis during Operations and Management), identifying all the environmental and social risks. This register is supposed to be reviewed and updated by the ESG Lead. ○ The ESMS also clearly states the asset to develop a Site Specific Environmental and Social Management Plan (ESMP). 	<ul style="list-style-type: none"> ○ Site Specific ESMP to be prepared and documented. ○ At the time of new asset acquisitions, as part of E&S risks identification IndiGrid should: <ul style="list-style-type: none"> - undertake a Land Due Diligence, - assess possibilities of absorbing human resources (employees and workers) from previous owner/developer into own company/SPV; 	<p>Medium</p>

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	<p>process. The scope of the risks and impacts identification process will be consistent with good international industry practice and will determine the appropriate and relevant methods and assessment tools.</p>	<ul style="list-style-type: none"> o IndiGrid is required to undertake Internal audits on EHS parameters as planned by Quality Department. There is presently no provision of internal audits that monitor/assess labour and land related compliances at Company or asset level. o The Corporate level ESMS provides a process to be followed before acquisition of new assets. This includes preliminary identification of E&S risks, undertaking various studies, including land due diligence, and preparation of asset-specific action plans. <p><u>All sites</u></p> <p>There are no internal audits undertaken to assess risks against labour working conditions, However EHS audits are maintained and recorded monthly.</p>	<ul style="list-style-type: none"> - conduct a high level stakeholder mapping to identify involvement of different stakeholders at an early stage; - in case Indigenous Peoples are involved in any way seek for documentation that at least includes: <ul style="list-style-type: none"> o in case line passes through forest land – o IndiGrid will make reasonable efforts to obtain all the FRA certificates and the detailed minutes from the developer, recognizing that these rights were settled nearly 6-7 years ago, and the documents may be difficult to access in case line passes through schedule V area – gram sabha resolutions and recommendations, o presence of culturally or historically significant site in proximity of the line – permissions from relevant authorities to disrupt them. o IndiGrid to undertake internal audits to assess labour related compliances against applicable labour laws and ILO ratifications of India. The Corporate level HR/Administration Department should develop this Audit Protocol and the asset level Contractor Management Team should undertake these Audits and report back to the Corporate HR. <p><u>All sites</u></p> <ul style="list-style-type: none"> • The Contractor must share a written undertaking to paying minimum wages and meeting compliance requirements. • The Contractor Management Procedure, IndiGrid will include regular reviews and payment of all dues under the Provident Fund and other compliance requirements, update the labor provisions / requirements in the contractor agreements and communicate the same on a regular basis to the workers, and get the ESMS requirements to be cascaded to the contractors, including monthly reporting of grievance log. • IndiGrid will conduct labour and working condition assessment on the SPV and O&M contractors, on compliance on regulations as well as PS2 as a part of 	

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			the internal EHSS monitoring. These shall include but not be limited to: <ul style="list-style-type: none"> - non-compliances with respect to payment of wages, PF and ESI contributions, leaves etc. - documentation of records, - living conditions if case of any contractor provided labour accommodation is set up, - discrimination practices, - grievances. 	
4.	<p>Organizational Capacity and Competency:</p> <p>The client, in collaboration with appropriate and relevant third parties, will establish, maintain, and strengthen as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. Specific personnel, including management representative(s), with clear lines of responsibility and authority should be designated key environmental and social responsibilities should be well defined and communicated to the relevant personnel and to the rest of the client's organization. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous environmental and social performance.</p>	<ul style="list-style-type: none"> o According to the ESMS document, IndiGrid has established an ESMS Committee to oversee the Implementation. The committee involves the Committee Chairman (CEO), Core Members (COO, CIO etc..) and the member Secretary (ESG Lead). o The main roles and responsibilities of the Committee is to appoint key Environment and Social personnel at various levels, advise the board on identified E&S risks, oversee ESMS implementation (through meetings), review periodic E&S reports submitted by the assets, undertake annual review of ESMS documents and update it as necessary. o Based on discussions during site visit, it was observed that IndiGrid has one person in charge of all the HSE operations, leading the line managers of every asset. o There is lack of dedicated teams for the following functions: <ul style="list-style-type: none"> (a) Contractor Management, (b) External Stakeholder Engagement (including Community). <p><u>All sites</u></p> <p>There is lack of a dedicated team/person for Stakeholder Engagement and Grievance Redressal at asset level for all assets. It was noted that the community grievances are dealt at the site level by assets managers and if needs high managements inclusion in which case it is transferred to the higher management. As per consultations with EHS head, till date no grievances are reported.</p>	<ul style="list-style-type: none"> o Site specific E&S reports, as defined in ESMS, should be prepared. o It is recommended that IndiGrid appoints or identified among the existing staff at Regional level, a dedicated Contractor Management team with knowledge of labour regulations and contractor management Contractor Management team that will report to the Corporate HR/Administration Department as well as facilitate ESMS implementation with the Corporate level Contracts team. o IndiGrid is recommended to identify Stakeholder Engagement/Public Relations person at asset level who can work under the Regional Manager currently responsible and formally assign responsibilities of community engagement and liasoning at asset level to the person. o Appoint an EHSS lead at the Corporate Level who will be overall responsible for the implementation of the ESMS and obligations under the ESAP. o Designate and define clear responsibilities for Regional EHSS Managers to oversee E & S performance and ESAP implementation for the assets in the portfolio o EHS Managers, Social Managers and O & M Team will be trained on the ESMS, ESMP, Grievance Management and SEP. <p><u>All sites</u></p> <ul style="list-style-type: none"> o IndiGrid should ensure an SEP and grievance mechanism are put in place at each asset and will be included in the O & M Contractor's responsibilities. 	Medium

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			<ul style="list-style-type: none"> o The IndiGrid team at the SPV should review the implementation of these on a regular basis and ensure grievances are resolved according to the GRM process defined in the ESMS. o The ESMS monitoring should also review the implementation of the SEP and GRM at each of the 5 assets 	
5.	Emergency Preparedness and Response (EPRP): Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS will establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.	<ul style="list-style-type: none"> o IndiGrid has developed Emergency Preparedness and Response Plan (EPRP) as per SO 9001:2015, ISO14001:2015 and ISO 45001:2018 requirement. The plan was developed in October 2020 and has been approved by an authorized signatory (Head SS/ TL) from IndiGrid. As per review of the procedure on quick restoration in any emergency situation such as tower collapse events thus minimizing the outage hours & availability loss has during the operation and maintenance of the Transmission Line (TL) site has identified Plan. Emergency Control Centre emergency assembly point, fire extinguishers and hazardous chemical locations and display of list of emergency contact numbers and route maps to nearest hospitals has also been detailed out in the EPRP. o Identification of emergencies situation has also been undertaken during O&M of the site. Key designations (Emergency Coordinator and Incident Commander) and responsibilities for managing emergency situations have also been documented. <p>All sites</p> <ul style="list-style-type: none"> • Site-level Emergency Response Team (ERT) details were displayed at site office. At some locations emergency exits were not provided at site office. • The site employees are provided with training to combat any kind of emergency on-site. 	<p>All sites</p> <ul style="list-style-type: none"> • A asset-specific Emergency Preparedness Plan needs to be developed. As a part of its Contractor Management Procedure IndiGrid HSE Manual will be a part of all Contracts with sub- contractors and compliance to which will be monitored as a part of the internal EHSS monitoring 	-
6.	Monitoring and Review: The client will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements. The client's monitoring program should be overseen by the appropriate level in the organization. For projects with significant impacts, the client will retain external experts to verify its	<ul style="list-style-type: none"> o Presently, it was observed that there was monitoring and review mechanism in place at the corporate level for monitoring EHS and social performance, applicable for all assets and associated contractors. Safety audits are conducted which cover aspects on PPE, tools used, work procedures etc. o At the Corporate level, IndiGrid uses a Compliance Management Solution called "Legatrix" to keep updated of all the environment, social and legal regulations to be complied with. This system has triggers set up and alerts the responsible person, in case of any statutory non-compliance. o The screenshots of Legatrix shared for review show status against whichever (not known) legislations are covered in this software. As of January 2022, there are 7 pending requirements for PKTCL, 9 for RTCL, 12 for MTL, and none for JTCL sites. o The ESMS states that the Regional Head will regularly review the regulatory environmental and social licences applicable to the operational 	<ul style="list-style-type: none"> o IndiGrid to establish an asset specific ESMP o IndiGrid to undertake Internal (Corporate level) and External Audit reports as per ESMS. o IndiGrid will prepare a detailed EHSS protocol agreed with lenders to drive internal monitoring on E & S performance. This will be an annual monitoring, the findings of which will be shared with lenders. o Include E&S compliance review as a part of the internal EHSS monitoring and receive and implement recommendations on strengthening compliance management as well resource capacity to service the 5 assets. o The EHSS monitoring should also review the implementation of the SEP and GM at each of the 5 assets. IndiGrid will include labour and working 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	monitoring information. The extent of monitoring should be commensurate with the project's environmental and social risks and impacts and with compliance requirements.	<p>projects. The Regional head to maintain a document on monthly basis and update the licence files. IndiGrid, however, has not shared these audit reports for analysis.</p> <ul style="list-style-type: none"> According to their Audit requirements (in ESMS), an external third-party consultant should conduct an audit of systems on an Annual basis. IndiGrid has documented a SOP on "Procedure for Internal Audit" (Doc Ref : IGT_SOP_ORG_015). The ESG lead to conduct quarterly basis internal environmental and social performance audit for the implementation and compliance of ESMS. IndiGrid has conducted Internal IMS Audits of the system at Asset level; Audit reports have been shared by corporate and discussed in Section 5.2. <p>All sites</p> <ul style="list-style-type: none"> At site it was observed that the monitoring of health and safety, social related concerns are dealt by the asset managers. All the records of scheduled trainings, mockdrills, daily work etc. are maintained by the EHS officer/supervisor appointed from O & M contractor's side. 	<p>condition -assessment on the SPV and O&M contractors, on compliance on regulations as well as PS2 as a part of the internal EHSS monitoring</p> <p>All sites</p> <ul style="list-style-type: none"> IndiGrid to appoint a asset specific EHS person who can record all these matters. 	
7.	Stakeholder Engagement & Grievance Redressal: Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities, 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	<ul style="list-style-type: none"> External stakeholders identified through various systems are: vendors and suppliers (through Vendor and O & M evaluation process covering OHS&E), customers (Company extends applicability of its Code of Ethical Business Conduct to customers. Maintains records of penalties and incentives received by Regulatory team. Uses emails and written correspondence for feedback.), contractors (monthly training as the means of communication), community nearby the Company assets is also recognised as a relevant external stakeholder. The SEP and GRM developed as part of the Corporate level ESMS include provisions for this category of stakeholders. NGOs and Media Groups are also considered external stakeholders of the project. Provisions of Corporate level SEP and GRM extend to these stakeholders. Investors, include debentures, unitholders, InvIT Trusts etc. are recognised as key stakeholders, Indigenous Peoples such as forest dwellers and people belonging to Schedule Tribe community living nearby project locations, are identified as project stakeholders (ESMS has provisions for engagement with this group of stakeholders). A Stakeholder Management Plan (SEP) has been developed as part of the Corporate ESMS. It covers: 	<ul style="list-style-type: none"> IndiGrid to undertake stakeholder mapping to identify all relevant stakeholders and accordingly prepare an asset level Stakeholder Engagement Plan. IndiGrid to form a Grievance Redressal Cell and the Cell to carry out responsibilities given in the Grievance Redressal Plan. The above two systems should be communicated to the stakeholders it intends to cater to, via formal written letters and/or formal meeting of which minutes shall be recorded. With respect to GRM for external stakeholders (especially for project affected and those living in proximity of the project corridor), IndiGrid can offer different means of communication including (online) email address of the GRC, a feedback window on its website that connects to GRC, (telephonic) a hotline number operated by GRC etc. so that all stakeholders can reach out to the Company using a convenient option. Five assets to develop and implement asset specific ESMP, SEPs and grievance mechanisms based on the corporate ESMS. Grievance mechanism will be available for internal and well as external stakeholders. 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	<p>and interests of the Affected Communities.</p>	<ul style="list-style-type: none"> ○ process of identifying stakeholders for a particular asset ○ stakeholder profiling and mapping ○ nature of impacts on stakeholders ○ engagement procedures ○ specific methods of engagement for Indigenous Peoples (IPs). ● The Corporate level SEP suggests that a project level SEP document shall be prepared that is contextualized to the Project specific stakeholders, potential issues, scale of IndiGrid's operations, and interlinked with other plans such as GRM. However, IndiGrid is yet to prepare site level SEPs. Presently the engagement activities are focused to landowners who suffered damaged of crops/trees due to project activities. ● A Grievance Redressal Mechanism (GRM) has been developed as part of the Corporate ESMS. However, it is yet to be rolled out. ● The GRM provides for a description of the external grievances related to communities, NGOs and media groups. And suggests a 'Grievance Redressal Cell' to be formed to manage the concerns of these various stakeholders. The Cell has not yet been formed and presently there are no records available of meetings conducted as a part of the same. ● As part of existing practices, IndiGrid on its website has made available contacts of Compliance Officer, Investor Relations Officer, Registrar and Transfer Agents etc. for investors to reach out for any inquiries, concerns, or feedback. ● Grievance handling for internal stakeholders and third party workers discussed under PS2 section of this table. 	<ul style="list-style-type: none"> ● The Stakeholder Engagement planning, and design of the Grievance Mechanism will include stakeholder mapping and analysis as well as plans. The SEP will include commitment to engage with the affected people and agree on the mitigation measures including the development and implementation of an education program to sensitize communities/stakeholders about the safety risks (and environmental hazard) associated with unsafe practice of stubble burning. For Scheduled V areas, tailor the SEP and grievance mechanism to make them accessible to the tribal community in language and, design that is culturally appropriate. ● The Corporate Grievance Mechanisms will allow all kind of grievances to be received, and have provisions to receive anonymous grievances, be confidential, safeguards against reprisal and retaliation, and be driven by a system of logging, tracking and analyses of the grievances on a regular basis. The GM will be reviewed based on agreed Key Performance Indicators (KPIs) ● Extend the grievance mechanism to the local community in its assets. This community GM will allow all grievances to be registered including those related to their ongoing operations as well as those related to past claims and compensation related to the LA and use of the RoW. ● Where IndiGrid is responsible for the impact, it will resolve the issue/concern and mitigate the impacts based on principles defined in PS 5. ● For past impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people) ● The Grievance mechanism will be provided in the IndiGrid website with appropriate details and guidance, along as well as a phone number to use to register any grievances. Affected communities/stakeholders will be made aware of the grievance mechanism (access, function, etc.) through ongoing stakeholder engagement 	

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
			as well as information provided at each of the site office notice boards. <ul style="list-style-type: none"> Regularly monitor the status of all grievances at an asset level and cumulatively at IndiGrid level. EHS and Social Manager as well as O & M contractor trained on Grievance Management 	
IFC PS-2: Labour and Working Conditions				
1.	Human Resource Policies and Procedures The Client will adopt and implement human resource policies appropriate to its size and workforce that sets out an approach to managing workers consistent with the requirements of this performance standard and the national law.	<ul style="list-style-type: none"> This section is intended to provide an understanding of IndiGrid's Corporate level systems in relation to PS2. The employees of IndiGrid include the Corporate level staff and executives, regional level staff and executives, and asset level managers and office engineers. IndiGrid has prepared an Employee Policy Manual that consists of policies and procedures for various employee related aspects including induction to the job, attendance and leaves, transfers, relocations and exits, loan and advances, medical insurance, compensation, among other entitlements. The Company Exit Policy deals with different kinds of separation including voluntary, involuntary separation, retirement and death. There is presently no formal policy on retrenchment in place. With respect to recruitment, the Company gives preference to retaining employees of organisations IndiGrid acquires. The manual also consists of guidelines on prevention of sexual harassment at workplace and makes provision of an Internal Complaints Committee (ICC) to handle concerns under this policy. The ICC comprises of 3 female members, 1 member outside of the organization. IndiGrid is also governed by a Code of Ethical Business Conduct, which defines nature of professional relationships between co-workers, competitors, customers etc. It covers elements of Whistle Blower, Anti-discrimination, Social Media Communication, Anti-Corruption as well. All employees reportedly have access to an online portal named Zoho People. Any queries with respect to the policies in this manual can be posted on Human Resources helpdesk on this portal. There is lack of a formal grievance redressal system for IndiGrid employees. A Grievance Redressal Mechanism (GRM) has been developed as part of the Corporate ESMS; however, it is yet to be rolled out. At present employees reach out to their Managers or HR Manager through phone calls, emails, in-person meetings in case of any grievances. For how these systems are implemented at asset level, and to understand the contractor management system, please refer to Table 5.2.2. 	<ul style="list-style-type: none"> IndiGrid to form a Retrenchment Policy that guides the process of forceful termination of employees or workers by including safeguards to minimise the negative impact on them. The Corporate level GRM to be rolled out at the earliest and the same to be communicated to all employees of IndiGrid in offices and at sites. IndiGrid will develop a Gender Strategy to increase women in the workforce for India IndiGrid Trust. The ESMS and, where applicable the Employee Policy Manual, will be revised to include a) Staff Grievance mechanism; b) GBV procedures, ensuring anon, confidential and survivor centric handling of grievances, as well as training to staff handling such matter; c) a policy on Freedom of Association, d) policy against gender-based discrimination at work and e) a Retrenchment Policy. Updated Employee Policy Manual will be accessible to all employee and workers via the "Zoho People" portal. Develop and implement a Contractor Management Procedure for all its contractors (and update its contracts with them appropriately) that will cover legal environmental and social obligations as well as cascading of the relevant ESMS requirements on developing and implementing ESMPs, labour and working conditions aligned with PS2, stakeholder engagement and grievance management processes as well as monitoring and reporting on these aspects. 	-
2.	Occupational Health and Safety:	<ul style="list-style-type: none"> A Health, Safety and environment Policy has been prepared and signed by their Chief Executive Officer dated 28th August 2020. In addition, an HSE Manual has also been prepared which covers aspects on general 	<ul style="list-style-type: none"> The IndiGrid HSE Manual to be a part of all Contracts with sub-contractors and compliance to which will be monitored as a part of the EHSS monitoring. 	-

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	The client will provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women.	<p>requirements of safety (Permit to work, HIRA, JSA, PPEs, Emergency response plan etc.) and various SOPs to be followed.</p> <ul style="list-style-type: none"> • Identification of Occupational hazards and associated risks have been ensured as a part of IndiGrid's Integrated Management System Manual. • IndiGrid has prepared a COVID safety protocols at the corporate level and related SOP's to be followed at all the assets. 	<ul style="list-style-type: none"> • Conduct periodic assessments based on ground patrolling, for critical towers once a month and for non-critical towers once a quarter across the five assets to identify health and safety as well as community risks. • Based on the survey and if risks are identified, update the HIRA to include the risks to community exposure from transmission line operations and impacts on the community due to electrocution; electromagnetic interference and implement appropriate mitigations measures. • Engage with District Administration, Panchayats, and local community on the mitigation measures before any inspection and repair works get done. IndiGrid will also develop and implement a community awareness programme. 	
IFC PS-3: Resource Efficiency and Pollution Prevention				
1.	Pollution Prevention, Resource Conservation and Energy Efficiency	<ul style="list-style-type: none"> ○ IndiGrid has established a SOP on Procedure for Pollution Control, providing guidance and instructions for control of pollution through various stages of Operation and Maintenance of Transmission Lines, control from emission from vehicles, domestic effluents; controls related to contractors and visitors, purchased good. The document also includes a note on Oil and Chemical Spill Management. <p><u>All sites</u></p> <p>Neither DG sets nor transformers are used in any of the assets as sub-stations are not included in the assets.</p>	<p>All sites</p> <p>Contract agreement can be made with local vendors which supplies canned water to hubs or offices</p>	-
2.	Wastes	<ul style="list-style-type: none"> ○ IndiGrid has developed a SOP on Procedure for Waste Management, providing guidance and instruction for disposal of the various kind of non-hazardous waste generated at all operating sites of Transmission Business. ○ The SOP also provides details on management of Hazardous wastes such as : <ul style="list-style-type: none"> ○ Used Oil ○ Used Cloth waste and machinery parts mixed with oil ○ Misc. waste ○ In addition to the above, SOP details Used Lead Acid Battery management, E-Waste management, Bio-medical waste management, etc., <p><u>All Sites</u></p>	<ul style="list-style-type: none"> ○ IndiGrid to obtain Hazardous Waste Authorization. Implement procedures to store all hazardous materials and wastes in designated areas with adequate secondary containment and dispose hazardous wastes through authorized entities in accordance with host country requirements. 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> Minimal quantities of hazardous waste such as used oil generated during maintenance activities of the transmission line and towers is disposed by the O & M contractor as per the regulatory requirements. It was seen at all the assets that the common waste included paper waste from office and kitchen wastes. Wastes is collected in dustbins which gets disposed through municipal facilities on a daily basis. 		
IFC PS-4: Community Health and Safety				
1.	Community exposure to risks and impacts	<ul style="list-style-type: none"> IndiGrid has developed corporate HIRA (followed at sites) but risks to community exposure from Transmission Line operations need to be included in the HIRA. The Corporate ESMS provides Security Personnel Management procedures. Security being the primary contact between community and project, there are provisions of training identified for them in the EMS. These trainings are to be conducted on respecting community traditions, practices, use of force, etc. At present, the security personnel do not undergo such training. <p><u>All assets</u> As informed, no formal community awareness programme is designed at asset level, but it was reported that whenever patrolling team/ IndiGrid's team sees anyone near transmission lines they communicate them about the precautions they need to take while working near TL.</p>	<ul style="list-style-type: none"> Updating ESMS with Security Management procedure IndiGrid to include community risk in HIRA Regional Managers to ensure that all security personnel in their respective regions undergo the trainings identified for them in the ESMS. Strengthen the implementation of corporate ESMS at individual assets on security management and ensure that: past records of security personnel employed are screened; security personnel have clear objectives and permissible actions laid out; security personnel are trained in avoidance of human rights abuses, identifying, and preventing gender-based violence and on protocols for interaction with community members and workers <p><u>All Sites</u></p> <ul style="list-style-type: none"> Separate community risk plan can be developed and implemented at the asset level. Community should be made aware of all the precautions to be taken during emergency cases. Training records of security personnel to be maintained 	Medium
2.	Emergency Preparedness and Response	<ul style="list-style-type: none"> IndiGrid has established a corporate level Emergency Preparedness and Response Plan, to be utilized at all assets. <p><u>All sites</u> There is no person at the asset level formally recognised as the community's point of contact. The Regional Manager is responsible for any communication with the community nearby project locations.</p>	<p><u>All Sites</u></p> <ul style="list-style-type: none"> The asset-specific emergency response plan should also consider offsite emergencies including the community nearby. Community should be made aware of all the precautions to be taken during emergency cases. 	-
IFC PS-5: Land Acquisition and Involuntary Resettlement				
1	Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> IndiGrid is understood to engage in acquisition of Operational assets. Hence, the Company is not likely to get involved in land procurement of 	<ul style="list-style-type: none"> During the O&M stage, follow-up on pending litigations and adherence to corrective actions suggested as part 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>any form; unless required for substations under their scope, any storage areas, labour camps etc. Therefore, the land related risks for the business are limited to legacy issues with respect to litigations, claims for unpaid or partially paid compensation during land take and construction damages, pending consent related matters, recognition and settlement of rights of schedule tribes, forest dwellers, and those living in schedule V areas etc.</p> <ul style="list-style-type: none"> Some O&M stage potential land related risks involve conflicts or legal disputes regarding pending or inadequate compensation for maintenance & repair stage damages, use of common properties such as village roads, community forests etc. At present, the Company has limited safeguards in place to avoid land-related issues being transferred from the project development stage or those realised during O&M stage. They include: <ul style="list-style-type: none"> The ESMS suggests conducting Land Due Diligence as part of new asset risk assessment process, The screening checklist used for categorisation, provided in the ESMS includes some questions on land related risks, such as physical displacement, Resettlement Action Plan (RAP), review of ESIA which generally covers detailed assessment of land procurement process, litigations related to land, publicly available information that suggests land related risks. However, since this ESMS was rolled out in November 2020; these safeguards were not in place and not adopted for projects acquired prior to this time. All 5 assets being assessed as part of this assignment were acquired prior to year 2020. Nevertheless, none of the 4 assets have resulted in physical displacement as reported. The asset-specific land-related risks are discussed in section 5.2.5 of this Chapter. <p><u>All sites</u></p> <ul style="list-style-type: none"> As the procurement of land was undertaken by the asset developer, there is lack of clarity on the process followed. Compensation for damage to crops and trees due to the construction activities was at three stages: a) during foundation work for the towers, b) during tower erection, and c) stringing of power lines between towers. Compensation for damages caused during maintenance and repair are to be paid by IndiGrid. 	<p>of this assignment shall help prevent and minimise risks in this category. Track the progress of the pending as well as new litigations across the 5 assets and maintain detailed documentation of the same, including payment of compensation and other actions determined by the court or government agencies.</p> <ul style="list-style-type: none"> IndiGrid while rolling out the ESMS, should begin undertaking Land Due Diligence as part of new asset risk assessment. The LDD to collect information and supporting documents on location sensitives such as forests, schedule V areas, and permissions obtained to pass through them; compensation payments against the market rates of that time; nature of pending litigations etc. to avoid any legacy issues and associated liabilities. <p>In case IndiGrid, for safety reasons imposes complete restrictions on any use of the land under tower base or in the corridor; IndiGrid can offer the following alternatives to minimise the negative impacts:</p> <ol style="list-style-type: none"> Leasing out alternate parcel of similar type and area of land in the vicinity for as long as the restrictions on original land parcels continue to be imposed, Transfer of amount equivalent to the average income generated from the land if no restrictions are imposed. <ul style="list-style-type: none"> While this happens very occasionally, identify where there are impacts on livelihood due to restriction in access or damages to crop/assets due to operations, assess the impact on the landowners/users, including an assessment of the economic loss, and implement appropriate mitigation measures, including compensation at replacement value and livelihood restoration where needed. Monitor these cases through the EHSS monitoring and ensure these are captured in the grievance mechanism records. 	
IFC PS-7: Indigenous Peoples				

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1	Indigenous Peoples	<ul style="list-style-type: none"> • The Company has put in place safeguards to avoid IP-related issues being transferred from the project development stage to the operations stage and safeguards to manage IP-related risks during Operations stage. These include: <ul style="list-style-type: none"> ○ The Stakeholder Engagement Plan developed as part of the Corporate ESMS considers IPs are an important project stakeholder and has identified special engagement needs for them, ○ In case the project falls under Schedule V area, the Project is required to form compliance to applicable regulations^[1], form village councils/committees to enable engagement with important villagers/representatives of IPs. ○ Any ESIA to be conducted for potential assets needs to assess impacts on IPs, ○ Projects are required to form compliance with IFC PS 7, ○ Project is required to implement an Indigenous Peoples Development Plan (IPDP) during O&M stage. • However, since this ESMS was rolled out in November 2020; these safeguards were not in place and not adopted for projects acquired prior to this time. All 5 assets being assessed as part of this assignment were acquired prior to year 2020. • Asset specific applicability of PS 7 and detailed assessment is provided in section 5.2.7. 	<p>- In case an asset to be acquired involves Indigenous Peoples in any way, IndiGrid shall seek information and documentation that involves the following at minimum:</p> <ul style="list-style-type: none"> ○ in case line passes through forest land – FRA certificates along with minutes or video evidence of gram sabha consultations; ○ in case line passes through schedule V area – gram sabha resolutions and recommendations, ○ presence of culturally or historically significant site in proximity of the line – permissions from relevant authorities to disrupt them. 	-
IFC PS-8: Cultural Heritage				
1	Cultural Heritage	<ul style="list-style-type: none"> • IndiGrid's existing safeguards related to culturally or historically significant sites include the following: <ul style="list-style-type: none"> ○ Any ESIA to be conducted for potential assets needs to assess impacts on cultural heritage, ○ During O&M stage, the project is required to map the key cultural sites along the corridor and associated facilities; if found, engage with their management entities, prepare an annual calendar of important events in the area and avoid risk related to any of these. 	-	-

^[1] -Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006
 -Panchayats (Extension to Scheduled Areas) Act, 1996
 -Scheduled Caste and Scheduled Tribe (Prevention of Atrocities) Act, 1989
 -UN Declaration of the Rights of Indigenous Peoples (UNDRIP)
 -UN Common Understanding on the Human Rights Based Approach to Development Cooperation
 -UN Development Group's Guidelines on Indigenous Peoples' Issues;
 - International Labour Organization's Convention 169 concerning Indigenous and Tribal Peoples in Independent Countries (1989)
 -IFC PS 7, especially in terms of Free Prior Informed Consent (FPIC).

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> • However, since these safeguards were rolled out in November 2020; they were not in place and not adopted for projects acquired prior to this time. All 5 assets being assessed as part of this assignment were acquired prior to year 2020. • Asset specific applicability of PS 8 and detailed assessment is provided in section 5.2.8. 		

5.2 Assessment for IFC Performance Standards for IndiGrid at Asset Level

5.2.1 IFC PS-1: Assessment and Management of Social & Environmental Risks and Impacts

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	<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.</p>	<p><u>Site specific observations</u></p> <p><u>PKTCL</u></p> <ul style="list-style-type: none"> The HSE Policy dated 28th August 2020 signed by the CEO was noted to be displayed at the site office. The workers were observed to be cognizant of IndiGrid's as well as JBS's HSE Policy. However, HSE policy of JBS was not displayed at the Site office. Further, it was noted that the policy was displayed only in English language. PKTCL K-C Line has a specific EHS plan, where EHS Policy (signed by their Managing Director) is included as part of the document. ESG policy is not in place. <p><u>JTCL</u></p> <ul style="list-style-type: none"> It was observed that HSE policy was used at the asset level and employees were also aware of IndiGrid's commitment and governing policies signed by the CEO was noted to be displayed. However, it was noted that the policy was displayed only in English language. Contractors given the charge of maintenance did not have a separate HSE policy in place <p><u>MTL</u></p> <ul style="list-style-type: none"> The HSE Policy dated 28th August 2020 signed by the CEO was noted to be displayed at the site office. Additionally, the HSE policy of the O & M contractor was also displayed at the site office. However, it was noted that the policy was displayed only in English language. <p><u>RTCL</u></p> <ul style="list-style-type: none"> Documented risk assessment for the asset is yet to be made available at site. As per review of HSE manual for Operation and Maintenance activities, it was noted that checklists have been prepared for usage of PPEs, in-house training register, incident reporting. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> The HSE Policy dated 28th August 2020 signed by the CEO was noted to be displayed at the site office. The workers were observed to be cognizant of 	<p><u>Site specific Recommendations</u></p> <p><u>PKTCL</u></p> <ul style="list-style-type: none"> EHS policy to be displayed at the site in English as well as local language. EHS Policy of JBS to be displayed at the Site Office. <p><u>JTCL</u></p> <ul style="list-style-type: none"> EHS policy to be displayed at all sites in English as well as local language. Contractor to have a separate EHS plan <p><u>MTL</u></p> <ul style="list-style-type: none"> EHS policy to be displayed at the site in English as well as local language. <p><u>RTCL</u></p> <ul style="list-style-type: none"> A signed copy of O&M manual including task, procedures, responsibilities, timelines of contractors could be made available A Legal Register comprising of applicable environment and social legal regulations at the operational stage of the project can be developed. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> EHS policy to be displayed at all sites in English as well as local language. Contractor to have a separate EHS plan. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>IndiGrid's as well as JBS's HSE Policy. Further, it was noted that the policy was displayed only in English language</p> <ul style="list-style-type: none"> • JBS uses same policy and plans developed by IndiGrid. • As per review of HSE manual for Operation and Maintenance activities, it was noted that checklists have been prepared for usage of PPEs, in-house training register, incident reporting, HSE audit checklist, toolbox talks and the attendees, first-aid box checklist, US/UC, monthly EHS review meeting etc. • All these reports are prepared monthly and which are presented monthly with the Regional EHS head. 		
2.	<p>Identification of Risks and Impacts: The client will establish and maintain a process for identifying the environmental and social risks and impacts of the project. The type, scale, and location of the project guide the scope and level of effort devoted to the risks and impacts identification process. The scope of the risks and impacts identification process will be consistent with good international industry practice and will determine the appropriate and relevant methods and assessment tools.</p>	<p><u>PKTCL</u></p> <ul style="list-style-type: none"> • IndiGrid has developed Corporate level HIRA for all its assets, which was observed to be communicated at the asset level. The document prepared consists of activities like firefighting with different extinguishing agents and fire hydrants, movement of vehicles site, maintenance of tower earthing, pantry activities being some of the activities amongst many. Against all these activities hazards, risks, consequences existing risk controls were mentioned. • During site inspection, HSE PAN India head mentioned that these risks and impacts are directly linked with the Asset managers performance and monetary aspects. Contractor side also adheres to these points provided by IndiGrid. • IndiGrid's ESMS has reported that a Project specific "Environmental and Social Management Plan (ESMP)" will be prepared. However, the said ESMP was not prepared / not presented for review. <p><u>JTCL</u></p> <ul style="list-style-type: none"> • IndiGrid has developed HIRA for all its assets, which have been observed to be communicated at the site level. The document prepared consists of activities like firefighting with different extinguishing agents and fire hydrants, movement of vehicles site, maintenance of tower earthing, pantry activities being some of the activities amongst many. Against all these activities hazards, risks, consequences existing risk controls were mentioned. • During site inspection, HSE PAN India head mentioned that these risks and impacts are directly linked with the Asset managers performance and monetary aspects. Contractor side also adheres to these points provided by IndiGrid. <p><u>MTL</u></p> <ul style="list-style-type: none"> • IndiGrid has developed HIRA for all its assets, which have been observed to be communicated at the site level. The document prepared consists of activities like firefighting with different extinguishing agents and fire hydrants, movement of vehicles site, maintenance of tower earthing, pantry activities being some of the activities amongst many. Against all these activities hazards, risks, consequences existing risk controls were mentioned. 	<p><u>All sites</u></p> <ul style="list-style-type: none"> • IndiGrid to undertake quarterly internal audits (including labour and working conditions). These shall include but not be limited to: <ul style="list-style-type: none"> - non-compliances with respect to payment of wages, PF and ESI contributions, leaves etc. - lack of documentation of records, - living conditions if case of any contractor provided labour accommodation is set up, - non-discrimination practices, - grievances. • Develop Site Specific ESMP. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> It was reported that these risks and impacts are directly linked with the Asset managers performance and monetary aspects. Contractor side also adheres to these points provided by IndiGrid. IndiGrid's ESMS has reported that a Project specific "Environmental and Social Management Plan (ESMP)" will be prepared. However, the said ESMP was not prepared / not presented for review. <p><u>RTCL</u></p> <ul style="list-style-type: none"> However, documented risk assessment for the project is yet to be made available at site. As per review of HSE manual for Operation and Maintenance activities, it was noted that checklists have been prepared for usage of PPEs, in-house training register, incident reporting. Procedures for risk assessment such as aspect/impact identification, Hazard Identification and Risk Assessment (HIRA) have been developed as part of the HSE Manual. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> IndiGrid has developed HIRA for all its assets, which have been observed to be communicated at the site level. The document prepared consists of activities like firefighting with different extinguishing agents and fire hydrants, movement of vehicles site, maintenance of tower earthing, pantry activities being some of the activities amongst many. Against all these activities hazards, risks, consequences existing risk controls were mentioned. As and when new tasks are allotted, risk and preventive measures are listed separately from the HIRA and are followed. 		
3.	<p>Organizational Capacity and Competency:</p> <p>The client, in collaboration with appropriate and relevant third parties, will establish, maintain, and strengthen as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. Specific personnel, including management representative(s), with clear lines of responsibility and authority should be designated key environmental and social responsibilities</p>	<p><u>PKTCL</u></p> <ul style="list-style-type: none"> IndiGrid doesn't have in place asset level HSE organogram or any HSE officer. The project operations are managed by the Line in charge deployed by IndiGrid who reports to the Regional Manager at Corporate level. Asset manager or line manager is responsible for taking into account all the HSE related information or mis happenings if at some time it takes place. From contractors' side one person is dedicated to HSE activities like conducting trainings and mock drills as and when required. IndiGrid HSE head takes into account their daily activities and have a group where all the HSE in charge along with him present. PKTCL has an asset level Corporate Organization chart but does not include EHS activities. 	<p><u>All sites</u></p> <p>IndiGrid is recommended to identify Stakeholder Engagement/Public Relations person at asset level for all 4 sites, who will report to the Regional Manager and formally assign responsibilities of community engagement and liaisoning at asset level to the person.</p> <p><u>PKTCL</u></p> <ul style="list-style-type: none"> PKTCL to develop a site-specific organogram with respect to EHS activities. <p><u>JTCL</u></p> <ul style="list-style-type: none"> Asset level organogram to be prepared and a dedicated person apart from Asset manager can be devoted to these activities. <p><u>OGPTL</u></p>	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	<p>should be well defined and communicated to the relevant personnel and to the rest of the client's organization. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous environmental and social performance.</p>	<p><u>JTCL</u></p> <ul style="list-style-type: none"> IndiGrid doesn't have in place asset level HSE organogram or any HSE officer. The project operations are managed by the Line Incharge deployed by IndiGrid who reports to the Regional Manager at Corporate level. Asset manager or line manager is responsible for taking into account all the HSE related information or mis happenings if at some time it takes place. From contractors' side one person is dedicated to ESH activities like conducting trainings and mock drills as and when required. IndiGrid HSE head takes into account their daily activities and have a group where all the HSE in charge along with him present. <p><u>MTL</u></p> <ul style="list-style-type: none"> IndiGrid doesn't have in place asset level HSE organogram or any HSE officer. The project operations are managed by the Line Incharge deployed by IndiGrid who reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to Line Incharge as well as the Supervisor of O & M contractor. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> IndiGrid doesn't have in place asset level any specific HSE officer. The project operations are managed by the asset manager which is supported by one engineer deployed by IndiGrid. Asset manager reports to the Regional Manager at Corporate level. The EHS functions at the site are managed by the HSE officer engaged at the site by the O & M contractor. The HSE officer reports to asset manager as well as the Supervisor of O & M contractor. 	<ul style="list-style-type: none"> Asset level organogram to be prepared and a dedicated person apart from Asset manager can be devoted to these activities. 	
4.	<p>Emergency Preparedness and Response (EPRP): Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS will establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and</p>	<p><u>PKTCL</u></p> <ul style="list-style-type: none"> Corporate level EPRP Manual is referred at an asset level, which includes action plan to respond emergencies in case of fire, snake bite, animal attack etc (as provided in Table 5-1). The site employees are provided with training to combat any kind of emergency on-site. As part of their workers training schedule which happens every week and 4 times a month comprising of different training schedule like fire, classification of fire, fire prevention electric shock, heat stroke etc. Training reports of the same were not provided for review. Attendance registers of the activities that took place in the month of December 2021 and January 2022 were checked (respectively for every line). These take place in the presence of HSE officer and updated in the WhatsApp group to the head. 	<p><u>PKTCL</u></p> <ul style="list-style-type: none"> Emergency contact details and hierarchy of response chart to be displayed at the Site Office and O & M Hubs <p><u>JTCL</u></p> <ul style="list-style-type: none"> Site specific emergency preparedness and response plan can be made. <p><u>MTL</u></p> <ul style="list-style-type: none"> MTL to prepare a site-specific Emergency preparedness and Response plan. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	<p>emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.</p>	<ul style="list-style-type: none"> • Contact details at the time of emergency were available in the vehicles used for patrolling. Emergency contact hierarchy and details were not displayed at the site office. <p><u>JTCL</u></p> <ul style="list-style-type: none"> • Organisational level EPRP is referred at an asset level as well which includes action plan to respond emergencies in case of fire, snake bite, animal attack etc. The site employees are provided with training to combat any kind of emergency on-site. • As part of their workers training schedule which happens every week and 4 times a month comprising of different training schedule like fire, classification of fire, fire prevention electric shock, heat stroke etc. • Attendance register of the activities that took place in the month of October and November '2021 were checked. These take place in the presence of HSE officer and updated in the WhatsApp group to the head. • Contact details at the time of emergency were available in the vehicles used for patrolling. <p><u>MTL</u></p> <ul style="list-style-type: none"> • MTL has prepared and displayed a site-level Emergency Response Team (ERT) and has displayed emergency contacts at site office. Emergency exits were also provided at site office. • The site employees are provided with training to combat any kind of emergency on-site. • MTL conducts monthly mock drills on different aspects of emergencies. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. • However, a site-specific Emergency Preparedness Plan has not been developed by MTL. <p><u>RTCL</u></p> <ul style="list-style-type: none"> • Identification of emergencies situation has also been undertaken during O&M of the site. Key designations (Emergency Coordinator and Incident Commander) and responsibilities for managing emergency situations have also been documented. • Emergency Control Centre emergency assembly point, fire extinguishers and hazardous chemical locations and display of list of emergency contact numbers and route maps to nearest hospitals has also been detailed 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p><u>OGPTL</u></p> <ul style="list-style-type: none"> IndiGrid has prepared and displayed a site-level Emergency Response Team (ERT) and has been displayed emergency contacts at offices and hubs. However, Emergency exits were not provided at site office. The site employees are provided with training to combat any kind of emergency on-site. IndiGrid conducts monthly mock drills on different aspects of emergencies. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. 		
5.	<p><i>Monitoring and Review:</i> The client will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements. The client's monitoring program should be overseen by the appropriate level in the organization. For projects with significant impacts, the client will retain external experts to verify its monitoring information. The extent of monitoring should be commensurate with the project's environmental and social risks and impacts and with compliance requirements.</p>	<p><u>PKTCL</u></p> <ul style="list-style-type: none"> Asset manager is responsible for monitoring and to take note of all the activities and is supported by 2 engineers who work on 2 different lines along with the EHS officer from contractor's side. Every month reporting is done to the EHS head, regional managers which is then monitored by the top management persons. Monthly EHS statistics are submitted to IndiGrid Corporate team for review. They have a key performance indicator (KPI) which is mainly of leading and lagging categories, and out of 100 the score is given. However, the EHS Statistics was not made available for review. Various reports covering monthly EHS activities were made available for review. Site has conducted Internal Audit to check for requirements of ISO 9001:2015, ISO14001:2015 and ISO 45001:2018, and report submitted for review. The report was prepared by the Head – PEX and reviewed by COO in July 2020. The audit report states the standard, particulars to be checked and provides a Compliance / Non-Compliance status. Audit Notes have been provided for any Non-Compliance standards. <p><u>JTCL</u></p> <ul style="list-style-type: none"> Asset manager is responsible for monitoring and to take note of all the activities and is supported by 2 engineers who work on 2 different lines along with the EHS officer from contractor's side. Every month reporting is done to the EHS head, regional managers which is then monitored by the top management persons. Monthly EHS statistics are submitted to IndiGrid Corporate team for review. They have a key performance indicator (KPI) which is mainly of leading and lagging categories, and out of 100 the score is given. Site has conducted Internal Audit to check for requirements of ISO 9001:2015, ISO14001:2015 and ISO 45001:2018, and report submitted for review. The report was prepared by the Head – PEX and reviewed by COO in September 2020. The audit report states the standard, particulars to be checked and 	<p><u>RTCL</u></p> <ul style="list-style-type: none"> IndiGrid site management shall maintain records pertaining to internal audit and inspection prescribed during site supervisions and review the same in subsequent visits to check implementation. Timelines in the grievance redressal of complaints should also be clearly defined. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>provides a Compliance / Non-Compliance status. Audit Notes have been provided for any Non- Compliance standards.</p> <p><u>MTL</u></p> <ul style="list-style-type: none"> • IndiGrid has an EHS committee which has representatives from Corporate as well as site level employees. Monthly meetings are undertaken to discuss the tracking and closure of non-compliances observed during site inspections. • Site HSE officer conducts monthly HSE audits for site, office building and labour hubs to review the performance of the site. External third-party audits are also conducted for reviewing the performance. • Monthly EHS statistics are submitted to IndiGrid Corporate team for review. • Site has conducted Internal Audit to check for requirements of ISO 9001:2015, ISO14001:2015 and ISO 45001:2018, and report submitted for review. The report was prepared by the Head – PEX and reviewed by COO in September 2020. The audit report states the standard, particulars to be checked and provides a Compliance / Non-Compliance status. Audit Notes have been provided for any Non- Compliance standards. <p><u>RTCL</u></p> <ul style="list-style-type: none"> • The records on internal audit and inspection documents have not maintained at site. • A quarterly monitoring of the regulatory compliance of the contractors on Contract Labour License, Maintenance of Wage register has undertaken by the IndiGrid HR/ Admin and Contracts team. • IndiGrid has established a grievance committee. The grievance committee maintains closure of grievances raised by employees / workers and community grievance at site level. However, the records on grievance redressal have not maintained at site. • It was also observed that no timeline defined as to the addressal of grievance complaints in the Employee Grievance Policy. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> • Site HSE officer conducts monthly HSE audits for site, office building and labour hubs to review the performance of the site. External third-party audits are also conducted for reviewing the performance. • Monthly EHS statistics are submitted to IndiGrid Corporate team for review. • Site has conducted Internal Audit to check for requirements of ISO 9001:2015, ISO14001:2015 and ISO 45001:2018, and report submitted for review. The report was prepared by the Head – PEX and reviewed by COO in September 2020. The audit report states the standard, particulars to be checked and 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		provides a Compliance / Non-Compliance status. Audit Notes have been provided for any Non- Compliance standards		
6.	<p>Stakeholder Engagement: Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities, 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.</p>	<p>All Sites IndiGrid does not have a formal asset specific stakeholder engagement plan or formal procedures in place. For any communication to happen in the field level, people communicate it to the contractors, who in turn inform the asset manager about the same and then it is taken to the higher level. Corporate level stakeholder plans are used at the asset level as well. This communication is mainly verbal and informal in nature, therefore, there are no records of this engagement.</p>	<p>All sites</p> <ul style="list-style-type: none"> Asset Managers of 4 assets to undertake stakeholder mapping of all relevant stakeholders, develop plan to engage with them. The plan should include methods of engagement, purpose of engagement, periodicity etc. Communities should be informed prior to any maintenance activities or any scheduled shut down to happen. 	Medium
7.	<p>External Communications and Grievance Mechanisms: Clients will implement and maintain a procedure for external communications. In addition, Clients will establish a grievance mechanism to receive and facilitate resolution of Affected Communities concerns and grievances about the Client's environmental and social performance.</p>	<p>All sites</p> <ul style="list-style-type: none"> A Grievance Redressal Mechanism (GRM) has been developed as part of the Corporate ESMS. However, it is yet to be rolled out on sites. Presently, the external communications at asset level is focused on local government bodies from whom various permits and licenses are required to be obtained. This includes, the Sub-Divisional Magistrate (SDM), Tahsildar, District Forest Officers (DFO) etc. However, as observed there are gaps in this communication, due to limited liaison. E.g. for OGPTL site, authorities at the SDM/Tahsildar/DFO offices and IndiGrid are not familiar with each other to an extent wherein some of the landowner grievances were not being forwarded to IndiGrid. 	<p>All sites</p> <ul style="list-style-type: none"> An asset level GRM to be developed for all 5 sites and responsibility of its implementation to be given to an existing person or a new appointment. Corporate GRC to monitor asset level GRM implementation. IndiGrid to place a suggestion/complaint registers and place a grievance boxes outside of every hub office, storage yard, asset level team's office etc. Asset manager to closely monitor the registers and drop boxes through coordination with local staff. IndiGrid shall extend the grievance mechanism to the local community which allows the grievances related to IndiGrid's operations as well as those related to past claims and compensation related to the LA and use of the RoW to get registered. For past impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
			<p>were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people)</p> <ul style="list-style-type: none"> • The Grievance mechanism shall be displayed in the IndiGrid website with appropriate details and guidance, along as well as a phone number to use to register any grievances. Affected communities/stakeholders will be made aware of the grievance mechanism (access, function, etc.) through ongoing stakeholder engagement as well as information provided at each of the site office notice boards. • Regularly monitor the status of all grievances at an asset level and cumulatively at IndiGrid level. • EHS and Social Manager as well as O & M contractor trained on Grievance Management • With respect to GRM for external stakeholders (including project affected persons, fence line community, local government bodies, media houses etc.), IndiGrid can offer different means of communication including: <ul style="list-style-type: none"> - (online) email address of the Asset manager, Site In-charge, and GRC, shared with concerned Gram Panchayats through letters, - the same can be made available on Company website, - a feedback window on its website that connects to GRC, - (telephonic) a hotline number operated by person responsible for GRM implementation at asset level, - (offline) address of the main asset/line specific office on Company website for drop-ins, - Office addresses for aggrieved to drop-off letters in the drop boxes outside of the office. <p>This allows stakeholders from all backgrounds to reach out to the Company in case of any grievance, feedback, suggestion etc.</p>	

5.2.2 IFC PS-2: Labour and Working Conditions

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1	<p>Human Resource Policies and Procedures</p> <p>The Client will adopt and implement human resource policies appropriate to its size and workforce that sets out an approach to managing workers consistent with the requirements of this performance standard and the national law.</p>	<p>All sites</p> <p>Employees:</p> <ul style="list-style-type: none"> All the aspects of Human Resource policies discussed in Table 5.1 PS2 section apply to asset level employees of IndiGrid too. Site level employees also have free and easy access to contact details of the Human Resource Manager and Compliance Officer on the Company website. <p>Workers:</p> <ul style="list-style-type: none"> IndiGrid has a Contractor and Supplier selection, management, and evaluation process defined at the Corporate level. There are certain gaps in implementation. They are as follows: <ul style="list-style-type: none"> There is a Contractor Compliance Monitoring Template prepared. The same needs to be populated with relevant laws and maintained at Corporate level, which is not done presently. The legatrix software includes certain regulations related to labour compliances (e.g. minimum wages act, payment of wages act, prohibition of child labour act, POSH rules); however, does not cover all applicable to the project. A Corrective Action Plan (CAP) needs to be developed at asset level and periodically monitored. This can be done independently or through use of legatrix, for requirements of all applicable labour laws. The contract agreements between project and contractor needs to include clauses on wages, working hours, overtime, anti-sexual harassment, grievance management etc. The selection of contractors, vendors is mainly focused on financial competitive criteria along with capacity to work at the scale required by the project. It does not include review of social performance e.g. past records of adequate and timely wage payment to workers, conditions of contractor provided labour accommodation, registration under EPF etc. IndiGrid has not undertaken retrenchment of workforce. Although in case it is required to be done, the Company shall follow rules under the Industrial Disputes Act 1947. Asset level offices, hubs were observed to have displayed key requirements under regulations of Prohibition of Child Labour, Minimum Wage payments, Contract Labour Act. However, these are in English at present and cannot be understood by the maintenance workers. 	<p>Recommendations made in Table 5.1 PS2 section are applicable to asset level employees as well. Therefore, both retrenchment policy and GRM implementation at Corporate level should extend to all employees across 5 assets.</p> <p>Legatrix to include all applicable labour laws and monitor compliance against them, including but not limited to:</p> <ul style="list-style-type: none"> - Contract Labour (Regulation & Abolition) Act, 1970; - Employees' State Insurance Act, 1948; - Employees' Provident Fund and Miscellaneous Provisions Act 1952; - Equal Remuneration Act, 1976; - Maternity Benefit Act 2017; - Private Security Agencies (Regulation) Act 2005; - Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979. <p>The following legal provisions (not limited to these) should be displayed at asset and hub offices, and storage yards in language understood by majority of workers:</p> <ul style="list-style-type: none"> - Working hours, - Leaves, - Skill-wise minimum wage rate for that quarter, <p>Prohibition of child labour and forced labour.</p>	-

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
2	<p>Documented Terms and Conditions with respect to employment</p> <p>The client will provide workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable agreements.</p>	<p>All sites</p> <ul style="list-style-type: none"> • Contractors across all 5 assets are required to submit the following to IndiGrid at the time of billing every time. <ul style="list-style-type: none"> - Employee register, - Wage register, - Attendance register, - Loans/advances register, - PF and ESIC challans, - Workmen compensation records, - Inclusion or exclusion of any worker, - Inclusion or exclusion of any worker under Interstate Migrant Workmen Act, - Undertaking of compliance to minimum wages, - Undertaking of overall compliance status. <p>This is followed at all sites.</p>	-	Medium
3	<p>Working conditions and terms of employment</p> <p>The client will document and communicate to all employees and workers directly contracted their working conditions and terms of employment-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"> • Minimum Wage Act, 1948 • Employees' State Insurance Act, 1948; • Employees' Provident Fund and Miscellaneous Provisions Act 1952; • Minimum Wages Act, 1948; 	<ul style="list-style-type: none"> • IndiGrid has signed agreements with the contractors engaged for the Operations and Maintenance works. Sample agreements and work orders were shared for review. The contractors are bound by these agreements to comply with the labour laws applicable to the project. The contract agreements, signed for JTCL are observed to lack coverage of labour related clauses. The coverage is limited to ambiguous statements such as 'all applicable labour laws' without reference to specific elements of the required compliance. <p><u>JTCL</u></p> <ul style="list-style-type: none"> • Based on review of sample records of attendance, wages, other worker entitlements, the following observations are made: <ul style="list-style-type: none"> - Wage payment to workers is in compliance with the statutory requirement of minimum wages, - Contractor has taken insurance under Workmen Compensation for the workers. - The PF deductions are inconsistent across workforce, wherein deduction are made for some workers and not made for others. - Workers do not perform overtime duty. - All the workers are above 18 years of age. • The consultations with workers on-site confirmed the above. • The workers are from states outside (West Bengal, Uttar Pradesh, Tamil Nadu, Himachal Pradesh, Jharkhand) of the states from where the TL passes. 	<p>The Contract Agreements to incorporate clauses on all statutory compliances related to labour including normal and overtime wages, working hours, leaves, grievance redressal, prohibition of child labour and forced labour, non-discrimination, payment in bank accounts, provision of wage slips, etc.</p> <p><u>JTCL</u></p> <ul style="list-style-type: none"> • PF deductions and contributions to be made consistently for all workers engaged for the project. • Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. • Contractors to register under the Interstate Migrant Workmen Act 1979 • The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. <p><u>MTL</u></p>	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	<ul style="list-style-type: none"> Equal Remuneration Act, 1976 	<p>However, the contractor has given an undertaking stating no one under Interstate Migrant Workmen Act 1979 is engaged.</p> <p><u>MTL</u></p> <ul style="list-style-type: none"> Based on sample records of attendance, wages, other worker entitlements shared, the following observations are made: <ul style="list-style-type: none"> Wage payment to workers follows the statutory requirement of minimum wages for unskilled category. Though the same could not be confirmed for other skill categories due to unavailability of applicable notification in the secondary domain. The latest minimum wage notification for skilled and highly skilled workers needs to be shared³² by the project team to confirm compliance, Deductions and contributions under PF and ESI are adhered to. Workers are given weekly offs without any deductions in payment. Workers do not perform overtime duty. All the workers are above 18 years of age. The consultations with workers on-site confirmed the above. The workers are from states outside (Assam and Jharkhand) of the states from where the TL passes. However, the contractor has given an undertaking stating no one under Interstate Migrant Workmen Act 1979 is engaged. This is a non-compliance at the end of both contractor as well as principal employer. <p><u>RTCL</u></p> <ul style="list-style-type: none"> Based on sample records of attendance, wages, other worker entitlements shared, the following observations are made: <ul style="list-style-type: none"> Wages paid to workers is as per the applicable minimum wage notifications, Deductions and contributions under PF and ESI are adhered to. Workers do not perform overtime duty. All the workers are above 18 years of age. On-site consultations with the workers confirmed the above. The workers are from states outside (Bihar, Uttar Pradesh, West Bengal, Jharkhand) of the states from where the TL passes. However, the contractor has given an undertaking stating no one under Interstate Migrant Workmen Act 1979 is engaged. This is a non-compliance at the end of both contractor as well as principal employer. <p><u>PKTCL</u></p> <ul style="list-style-type: none"> Based on sample records of attendance, wages, other worker entitlements shared, the following observations are made: 	<ul style="list-style-type: none"> Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. Contractors to register under the Interstate Migrant Workmen Act 1979 The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. <p><u>RTCL</u></p> <ul style="list-style-type: none"> Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. Contractors to register under the Interstate Migrant Workmen Act 1979 The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. Contractors to register under the Interstate Migrant Workmen Act 1979 The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. 	

³² The one available online does not include technicians, fitters, engineers that are employed in power transmission projects.

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> - Amount of wages paid to workers is as per the applicable minimum wage notifications, - Deductions and contributions under PF and ESI are adhered to. - Workers are given weekly offs without any deductions in payment. - Workers do not perform overtime duty. - All the workers are above 18 years of age. • The consultations with workers on-site confirmed the above. <p><u>OGPTCL</u></p> <ul style="list-style-type: none"> • Based on sample records of attendance, wages, other worker entitlements shared, the following observations are made: <ul style="list-style-type: none"> - Amount of wages paid to workers is as per the applicable minimum wage notifications, - Deductions and contributions under PF and ESI are adhered to. - Workers are given weekly offs without any deductions in payment. - Workers do not perform overtime duty. - All the workers are above 18 years of age. • The consultations with workers on-site confirmed the above. • The workers are from states outside (West Bengal, Uttar Pradesh and Jharkhand) of the states from where the TL passes. However, the contractor has given an undertaking stating no one under Interstate Migrant Workmen Act 1979 is engaged. This is a non-compliance at the end of both contractor as well as principal employer. 		
4.	<p>Worker accommodation:</p> <p>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 the basic services. This also includes the applicable requirements of the IFC guidelines on worker accommodation.</p>	<p><u>All sites</u></p> <ul style="list-style-type: none"> • There are no substations under IndiGrid’s management in any of these 4 assets. Hence, IndiGrid does not have their own offices at the sites. • The O&M contractors are reported to be working from Main Hubs and Sub Hubs (located along the stretch of the Transmission Line Asset). • IndiGrid has communicated that the hubs that are occupied by the contractors – are in fact units of residential accommodations rented by contractors (at the respective localities). These are provided free of cost by contractors to workers engaged by them. • At RTCL such accommodation facilities are available at Jeerapur and Jhalawar. • For MTL, such accommodation facilities are available at Medak and Shad Nagar. • For PKTCL, such accommodation facilities are available at New Ranchi. • For OGPTL, such accommodation facilities are available at each hub. 	<p><u>All sites</u></p> <ul style="list-style-type: none"> • Asset Management to develop Worker Accommodation Inspection Checklists aligning with the requirements and provisions under ‘Workers’ Accommodation: Processes and Standards’. The provisions should include ventilation, clean drinking water, hygienic conditions of latrines and bathing rooms, waste disposal mechanisms, separation of kitchen and living facilities, among others. • The checklist should be executed during internal labour audits and any gaps should be included in asset level Corrective Action Plan (CAP) for monitoring. Compliance should be formed against these CAP items at the earliest. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> Drinking water supply is met through purchase of bottled water. Domestic water is sourced from local water supply of that residential accommodation facility. Sanitation and solid waste disposal is done as per facilities available at residential accommodations, e.g. at OGPTL a daily garbage pick up by local panchayat is arranged for. The kitchens are separate from living areas. Sample facilities visited, were well ventilated, and observed to have maintained hygienic conditions in rooms and common premises. 		
5.	Grievance mechanism for workers Workers should be able to raise reasonable workplace concerns.	<u>All sites</u> There is no formal system of addressing worker grievances at any of the 4 sites. The current practices across assets involve, verbal communication of concerns by workers to Supervisors. If not resolved at the Supervisor level, they are communicated to Asset Managers through verbal communication. The project staff reported that at present there are no grievance received from workers. The workers confirmed the same during consultations.	<u>All sites</u> <ul style="list-style-type: none"> The asset level GRM needs to include dedicated mechanisms for workers' grievances. These may be in form of a grievance register placed at store rooms, drop boxes, or any other. The system should allow for, aggrieved receiving acknowledgement of grievance received, timebound resolution and escalation to asset management/regional management/corporate management etc. Once developed, the provisions should be communicated to the workers via formal meetings, which should be documented for future records. Any newly appointed contractor and workers should be made aware of this system at the time of induction. 	Medium
6.	Protecting the Work force The client will not employ children in any manner. The client will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.	<u>All sites</u> <ul style="list-style-type: none"> There were no workers below 18 years of age engaged at the site, during the site visit. The worker registers shared for review, also confirm no person engaged at site to be below 18 years of age. At none of the sites, the management or the contractors engage any form of forced or bonded labour, as understood through consultations with workers as well as project staff. 	<u>All sites</u> <ul style="list-style-type: none"> It is recommended that notices of prohibition of child labour and forced labour be displayed at store rooms in such a way that they are easily visible to every worker and security personnel visiting the store room. The notice should be in Hindi and locally understood language. The internal labour audit protocol to include questions on different forms/practices of forced labour that can be verified during the audit quarterly across all 5 assets. 	Medium
7.	Occupational Health and Safety: The client will provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including	<u>PKTCL</u> <ul style="list-style-type: none"> Regular training programs are organized for workers. An updated annual training calendar is in place and workers are trained on use of PPEs, HIRA, work at height, vehicle and driving safety rules, fire prevention and firefighting, road safety, first aid, and emergency preparedness etc. Training attendance sheets are maintained. For new employees, visitors and contract workers, safety induction trainings are organized. 	<u>MTL</u> <ul style="list-style-type: none"> MTL to ensure that an Environment, Safety and Health (EHS) Plan is submitted to IndiGrid by the O & M contractor. 	Low

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
	<p>physical, chemical, biological, and radiological hazards, and specific threats to women.</p>	<ul style="list-style-type: none"> • Toolbox talk are organized for the workers and employee daily on topics which includes general safety awareness, vehicle safety, emergency preparedness, firefighting safety and behaviour-based safety. Workers are also oriented on the uses of PPEs. • Mock drills are conducted at site every month. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. • A first-aid box has also been provided at site office in case of any emergency and in the patrolling vehicles. • PPEs for conducting maintenance activities are carried by the engineers while routine maintenance activities. • Drinking Water is procured from vendors as per the requirement. However, the water quality testing certificate to ensure quality of drinking water as per Standards IS 10500:2012 was not available for review. • IndiGrid maintains records of accident, incidents at site. During consultation and review of records, it was found that there were no major fatalities or Loss Time Injury recorded since initiation of project operations till date. • QEHS Review Meeting Minutes were shared for the months of December 2021 and January 2022. • The contractor has agreed to submit an Environment, Safety and Health (EHS) Plan to IndiGrid. However, this EHS plan was available for K-C line only. <p><u>JTCL</u></p> <ul style="list-style-type: none"> • Regular training programs are organized for workers. An updated annual training calendar is in place and workers are trained on use of PPEs, HIRA, work at height, vehicle and driving safety rules, fire prevention and firefighting, road safety, first aid, and emergency preparedness etc. Training attendance sheets are maintained. • For new employees, visitors and contract workers, safety induction trainings are organized. • Toolbox talk are organized for the workers and employee daily on topics which includes general safety awareness, vehicle safety, emergency preparedness, firefighting safety and behaviour-based safety. Workers are also oriented on the uses of PPEs. • Mock drills are conducted at site every month. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. • A first-aid box has also been provided at site office in case of any emergency and in the patrolling vehicles. 	<p><u>RTCL</u></p> <ul style="list-style-type: none"> • The existing Specific trainings pertaining to social aspects like cultural orientation to the site employees on how to deal with the community, implementation of procedures etc. to be imparted to the site employees. • A feedback form should be developed and to be used to assess the effectiveness of the trainings conducted. 	

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> • PPEs for conducting maintenance activities are carried by the engineers while routine maintenance activities. • Drinking Water is procured from vendors as per the requirement. However, the water quality testing certificate to ensure quality of drinking water as per Standards IS 10500:2012 was not available for review. • IndiGrid maintains records of accident, incidents at site. During consultation and review of records, it was found that there were no major fatalities or Loss Time Injury recorded since initiation of project operations till date. • The contractor has agreed to submit an Environment, Safety and Health (EHS) Plan to IndiGrid. However, this EHS plan has not been made available for review. <p><u>MTL</u></p> <ul style="list-style-type: none"> • Regular training programs are organized for workers. An updated annual training calendar is in place and workers are trained on use of PPEs, HIRA, work at height, vehicle and driving safety rules, fire prevention and firefighting, road safety, first aid, and emergency preparedness etc. Training attendance sheets are maintained. • For new employees, visitors and contract workers, safety induction trainings are organized. • Toolbox talk are organized for the workers and employee daily on topics which includes general safety awareness, vehicle safety, emergency preparedness, firefighting safety and behaviour-based safety. Workers are also oriented on the uses of PPEs. • Mock drills are conducted at site every month. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. • The site office is equipped with an emergency exit and demarcated assembly points have been provided. • A first-aid box has also been provided at site office in case of any emergency. • PPEs for conducting maintenance activities are carried by the engineers while routine maintenance activities. • Drinking Water is procured from vendors as per the requirement. However, the water quality testing certificate to ensure quality of drinking water as per Standards IS 10500:2012 was not available for review. • IndiGrid maintains records of accident, incidents at site. During consultation and review of records, it was found that there were no major fatalities or Loss Time Injury recorded since initiation of project operations. • The contractor has agreed to submit an Environment, Safety and Health (EHS) Plan to IndiGrid. However, this EHS plan has not been made available for review. 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p><u>RTCL</u></p> <ul style="list-style-type: none"> • However, no internal audit and management review has been conducted at the site visit in regard to implementation of ESMS. • Reportedly, IndiGrid implements the above-mentioned procedures at site. • It was also informed that Site Supervisor of IndiGrid provides Hands on training to contractors to carry out the task. • As reported by site management IndiGrid has managed the statutory compliance using Legatrix – an IT-enabled compliance tool which is integrated for automated monitoring and reporting of legal compliances across the portfolio. • The Contractor is also organizing periodical medical check-up (six monthly) for the drivers and equipment operator, height workers and dangerous substances handlers. • The site management reportedly has 04 first aid boxes with medical provisions for employees. The management also tied up with the government hospital in Jhalawar, about 60 kms from site, in case of medical emergencies. However, the medical check-up records were not available for review during the site visit. • Identification of emergencies situation has also been undertaken during O&M of the site as per review of the procedure. Key designations (Emergency Coordinator and Incident Commander) and responsibilities for managing emergency situations have also been documented. • During the site assessment, it was observed that warning signs, mandatory electric hazards signs, informatory signs, were displayed at towers and communities residing adjacent to the TL. • Training attendance sheet (Doc No: IGT-MAN-HSE-001-F15/2021) with training topics on Toolbox Talk, (Doc No: IGT-MAN-HSE-001-F1/2021) on spraying evidence etc. has been provided for review. However, no mechanism has been developed to assess the effectiveness of the training provided to the site employees. 		

5.2.3 IFC PS-3: Resource Efficiency and Pollution Prevention

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	Pollution Prevention, Resource Conservation and Energy Efficiency	<p>All sites Neither DG sets nor transformers are used in any of the assets as sub-stations are not included in the assets.</p> <p>PKTCL</p> <ul style="list-style-type: none"> As reported by IndiGrid water is not required for transmission line maintenance. For drinking purposes at site office and worker's accommodation, packaged drinking water (~20L/day/ office) is sourced from water vendors. Domestic water is sourced from local vendors. 20L water cans are used for the daily purpose. PKTCL has maintained PUC Certificates for the vehicles used for maintenance activities and PUC were noted to be valid for both IndiGrid and O & M vehicles No hazardous chemicals or oils are stored at site. Contractors EHS person records the tools inspection on a monthly basis and makes a note of the numbers of each available. This list includes various safety equipment's and other resources they need during regular maintenance with four sheave pulley, hydraulic cutter, ring spanner, hammer amongst few. <p>JTCL</p> <ul style="list-style-type: none"> As reported by IndiGrid water is not required for transmission line maintenance. For drinking purposes at site office and worker's accommodation, packaged drinking water (~40L/day) is sourced from water vendors. JTCL has maintained PUC Certificates for the vehicles used for maintenance activities and PUC were noted to be valid for both IndiGrid and O & M vehicles No hazardous chemicals or oils are stored at site. Contractors EHS person records the tools inspection on a monthly basis and makes a note of the numbers of each available. This list includes various safety equipment's and other resources they need during regular operation and maintenance with four sheave pulley, hydraulic cutter, ring spanner, hammer amongst few. <p>MTL</p> <ul style="list-style-type: none"> As reported by IndiGrid water is not required for transmission line maintenance. For drinking purposes at site office and worker's accommodation, packaged drinking water (~40L/day) is sourced from water vendors. Site does not have any DG sets. MTL has maintained PUC Certificates for the vehicles used for maintenance activities and PUC were noted to be valid. No hazardous chemicals or oils are stored at site. 	<p>RTCL</p> <ul style="list-style-type: none"> Contract agreement with the local vender of water supply should be maintained at the site office. 	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p><u>RTCL</u></p> <ul style="list-style-type: none"> It was reported that 100 litter/day water is currently being used at both RTCL site offices (Jeerapur and Jhalawar) for drinking purpose. This water is sourced and supplied by tankers through a local vendor. As reported by M/s Yashmun management, a contract with the vendor for this water supply arrangement has been made. However, the same was not made available for review. The site office has installed Reverse Osmosis (RO) installed in a separate dedicated cabin; the water used for drinking purpose is treated using Reverse Osmosis (RO) treatment at the site office. As reported by IndiGrid site management, the water is not required for transmission line operation and maintenance work. As reported by the Site Management, M/s Yashmun owns three (03) vehicles including one (01) office car, Bolero campers, two (02 for maintenance and operation of TL. Pollution under Control (PUC) Certificate for all vehicles has been obtained dated January 2017 and same was verified during site visit and was found to be within the permissible limit <p><u>OGPTL</u></p> <ul style="list-style-type: none"> As reported by IndiGrid water is not required for transmission line maintenance. For drinking purposes, It was noted that water purification system was in place at Jharsuguda site office and in total 4-5 ltrs of water is used daily. 2 of the hubs where O & Ms employees stay have borewells whereas other use water cans (20Ltrs). OGPTL has maintained PUC certificates of the vehicles used for the maintenance activities were in place and were noted to be valid. In total 7 vehicles are in use (2 for IndiGrid and 5 for O & Ms). Agreement is made for the vehicle to be used No hazardous chemicals or oils are stored at site. The asset team prepares monthly EHS statistics report which covers PPE's inspection list, fall protection equipment list, safety awareness training etc. and these are submitted to the higher management on monthly basis. IndiGrid has an agreement with BBC Tech associates which reviews and provide them with the certificate of fitness for the maintenance activity tools. 		
2.	Wastes	<p><u>All Sites</u></p> <ul style="list-style-type: none"> Minimal quantities of hazardous waste such as used oil generated during maintenance activities of the transmission line and towers is disposed by the O & M contractor as per the regulatory requirements. It was seen at all the assets that the common waste included paper waste from office and kitchen wastes. Wastes is collected in dustbins which gets disposed through municipal facilities on a daily basis. 	<p>IndiGrid to obtain Hazardous Waste Authorization for generation of hazardous waste.</p> <p>Implement procedures to store all hazardous materials and wastes in designated areas with adequate secondary containment and dispose hazardous wastes through authorized entities in accordance with host country requirements.</p>	Medium

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p><u>PKTCL</u></p> <ul style="list-style-type: none"> This asset includes a site office and 3 hubs where contractor side workers stay, and the wastes generated here are usual household wastes like kitchen waste, wrappers and packets. Disposal of these waste are done by the local municipality facilities provided in the area. Wastewater generated through the toilets at site office and labour hubs are discharged into municipal public sewage systems. <p><u>JTCL</u></p> <ul style="list-style-type: none"> Wastes are not as such generated near the transmission lines. They have 5 hubs in this asset where contractor side workers stay, and the wastes generated here are usual household wastes like kitchen waste, wrappers and packets. Disposal of these waste are done by the local municipality facilities provided in the area. <p><u>MTL</u></p> <ul style="list-style-type: none"> Waste generated from site office consists of paper waste mostly which is disposed off as scrap through waste vendors. The waste generated at worker's accommodation is regularly disposed off through municipal vehicle. Minimal quantities of hazardous waste such as used oil generated during maintenance activities of the transmission line and towers is disposed by the O & M contractor as per the regulatory requirements. Wastewater generated through the toilets at site office and labour hubs are discharged into municipal public sewage systems. <p><u>RTCL</u></p> <ul style="list-style-type: none"> IndiGrid has not formulated any waste management procedure for handling and disposal of hazardous and non-hazardous waste. The site does not have diesel generator set. hence generation of waste/ used oil is not involved. However, as reported by site Management that the transformer oil is changed every 5-10 years as a part of routine maintenance of substation site. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> Waste generated at the site are mostly paper waste and tea bags from kitchen waste category which are disposed off through local vendors. Waste generated at worker's accommodation are mostly kitchen wastes which is disposed off through local municipal waste disposal system. IndiGrid has not formulated any waste management procedure for handling and disposal of hazardous and non-hazardous waste. 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
3.	Pesticide Use and Management	<p><u>All Sites</u></p> <ul style="list-style-type: none"> As informed, pesticides are not used at site for vegetation growing near the transmission line. However, it was reported that snake repellent powder was spread around the Kharsia store monthly. 	-	-

5.2.4 IFC PS-4: Community Health and Safety

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	Community Exposure to Disease	<p><u>All assets</u> As informed, no formal community awareness programme is designed at asset level, but it was reported that whenever patrolling team/ IndiGrid's team sees anyone near transmission lines they communicate them about the precautions they need to take while working near TL.</p> <p><u>PKTCL</u></p> <ul style="list-style-type: none"> IndiGrid has a HIRA defined at the corporate level and it includes various activities and risks associated with it but site-specific HIRA is not developed. There are no communities in the immediate vicinity of the TL. The site does not discharge any wastewater that could lead to water borne diseases. <p><u>JTCL</u></p> <ul style="list-style-type: none"> IndiGrid has a HIRA defined at the corporate level and it includes various activities and risks associated with it but site-specific HIRA is not developed. There are no communities in the immediate vicinity of the TL. The site does not discharge any wastewater that could lead to water borne diseases. <p><u>MTL</u></p> <ul style="list-style-type: none"> There are no communities within the immediate vicinity of the transmission line route. The site does not discharge any wastewater that could lead to water borne diseases. The community health and safety aspect are limited to the health and safety of its employee and contractor workers. <p><u>RTCL</u></p> <ul style="list-style-type: none"> No dust emissions are generated from the operation activities of the site. The operation phase does not involve heavy vehicular movement that might pose traffic safety hazards for the community. During interaction with the community in Devli village, none of the villagers reported of any issues that they have encountered due to the operation activities. However, IndiGrid has not developed and maintained the community grievance redressal mechanism and Grievance Register for any grievances that emerges from the community. 	<p><u>RTCL</u></p> <ul style="list-style-type: none"> IndiGrid can develop and maintain a procedure for community grievance redressal mechanism and grievance register should ensure that it is communicated to the stakeholders. IndiGrid can also document all grievances and follow up on any corrective action done. The roles and responsibilities to deal with grievances can be defined which will include management, supervisors' and workers' representatives. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> IndiGrid can develop and maintain a procedure for community grievance redressal mechanism and grievance register should ensure that it is communicated to the stakeholders. 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p><u>OGPTL</u></p> <ul style="list-style-type: none"> No dust emissions are generated from the operation activities of the site. The operation phase does not involve heavy vehicular movement that might pose traffic safety hazards for the community. IndiGrid has not developed and maintained the asset specific community grievance redressal mechanism and Grievance Register for any grievances that emerges from the community. Though it was seen that the grievance redressal mechanism at corporate level mentioned in ESMS was present at the asset and it was communicated that as and when any grievances are reported that will be make use of. 		
2.	Emergency Preparedness and Response	<p><u>All sites</u></p> <p>There is no person at the asset level formally recognised as the community's point of contact. The Regional Manager is responsible for any communication with the community nearby project locations.</p> <p><u>PKTCL</u></p> <ul style="list-style-type: none"> There is limited interaction with the community, however community health and safety plan was not at place. <p><u>JTCL</u></p> <ul style="list-style-type: none"> There is limited interaction with the community, however community health and safety plan was not at place. <p><u>MTL</u></p> <ul style="list-style-type: none"> The community health and safety aspect are limited to the health and safety of its employee and contractor workers and thus there is limited interaction with the community. However, site has not prepared a Community Health and Safety Plan to ensure that the risks associated with project operations are communicated to the community and landowners. <p><u>RTCL</u></p> <ul style="list-style-type: none"> Though an emergency preparedness response plan has been formulated for the site, based on the corporate emergency response plan. However, it does not include procedures to be followed to inform the community. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> The community health and safety aspect are limited to the health and safety of its employee and contractor workers and thus there is limited interaction with the community. 	<p><u>All Sites</u></p> <ul style="list-style-type: none"> The asset-specific emergency response plan should also consider offsite emergencies including the community nearby. Community should be made aware of all the precautions to be taken during emergency cases. 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> However, site has not prepared a Community Health and Safety Plan to ensure that the risks associated with project operations are communicated to the community and landowners. 		
3.	Electric and Magnetic Fields	<p>All Site</p> <ul style="list-style-type: none"> As reported, there was no data available on the Electric and Magnetic Fields for the asset. 	<p>All Site</p> <ul style="list-style-type: none"> Conduct periodic assessments based on ground patrolling, for critical towers once a month and for non-critical towers once a quarter across the five assets to identify health and safety as well as community risks. Based on the survey and if risks are identified, update the HIRA to include the risks to community exposure from transmission line operations and impacts on the community due to electrocution; electromagnetic interference and implement appropriate mitigations measures. Engage with District Administration, Panchayats, and local community on the mitigation measures before any inspection and repair works get done. IndiGrid will also develop and implement a community awareness programme. As per IFC sector specific guidelines for electric transmission lines table 2³³, minimum working distance, and the minimum clear hot stick distance for 400kV line should be anywhere between 2.13 to 3 metres and for 765kV line 4.5 metres. The exposure limits for occupational exposure to electric and magnetic fields should be compared with Table 3 of the document³⁴. 	Medium
4.	Security	<p>All sites</p> <ul style="list-style-type: none"> The Corporate ESMS provides Security Personnel Management procedures. It includes provision of training on respecting community traditions, practices, use of force etc. At present, the security personnel do not undergo such training. As understood, any grievances received by the security personnel are reported verbally to the asset manager. There is lack of a formal community grievance handling system in place for the security personnel to implement. Moreover, the security personnel are appointed at store locations only; therefore, they are the primary points of contact between project and community in a smaller stretch compared to the length of the transmission line. <p>PKTCL</p>	<p>PKTCL</p> <ul style="list-style-type: none"> All the security personnel should be trained as guided in the Security Personnel Management procedures. The training records to be documented for monitoring purposes. The security personnel to be made aware of the external grievance redressal mechanisms once asset level GRM is developed. <p>JTCL</p> <ul style="list-style-type: none"> All the security personnel should be trained as guided in the Security Personnel Management procedures. The 	Medium

³³ [Final - Electric Power Transmission & Distribution.doc \(ifc.org\)](#)

³⁴ [Final - Electric Power Transmission & Distribution.doc \(ifc.org\)](#)

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> • There are 2 security persons (from Contractors side) at the Ghatsila hub, for a storeroom. Whenever the guards take off, one of the helpers takes charge (from the team). • There are no armed security personnel engaged for the project as reported. <p><u>JTCL</u></p> <ul style="list-style-type: none"> • There are 3 security persons appointed at site who work in shifts in the store yard. 1 security guard works in day and 2 at nights. • One of the guards at night is an armed security person. Reportedly, till date the guard has not resorted to use of violence or force. <p><u>MTL</u></p> <ul style="list-style-type: none"> • There are no armed or unarmed security personnel engaged for the project as reported. <p><u>RTCL</u></p> <ul style="list-style-type: none"> • As reported by site management that no security staff is deputed at site including armed and un-armed. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> • As reported by site management that no security staff is deputed at site including armed and un-armed. 	<p>training records to be documented for monitoring purposes.</p> <ul style="list-style-type: none"> • The security personnel to be made aware of the external grievance redressal mechanisms once asset level GRM is developed. <p><u>RTCL</u></p> <ul style="list-style-type: none"> • Site to engage security personnel and deployed at tower locations and formally assigned the responsibility of visiting a select number of towers weekly. • All the security personnel should be trained as guided in the Security Personnel Management procedures. The training records to be documented for monitoring purposes. • The security personnel to be made aware of the external grievance redressal mechanisms once asset level GRM is developed. 	

5.2.5 IFC PS-5: Land Acquisition and Involuntary Settlement

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	<p>Land Acquisition and Compensation</p> <p>Although this performance standard is not applicable to this Project, in this section, some key observations are discussed for each asset's land related risks including regulatory non-compliances; information gaps that hinder complete understanding of the process; legacy issues; and pending litigations.</p>	<p><u>All sites</u></p> <ul style="list-style-type: none"> As the procurement of land was undertaken by the asset developer, there is lack of clarity on the process followed. Based on consultations with landowners across 5 assets, the process followed is described in section 2.3.5 of this report. In addition, it is understood that the developer reviewed demand drafts issued to landowners, even in cases when an aggregator was involved in land take and was the first party to make the payment on behalf of Sterlite. Therefore, it can be said that the developer monitored the compensation paid to project affected. Consultations confirm that the process followed for land take from persons belonging to Scheduled Tribe and Scheduled Caste communities, was the same as the process followed with landowners from other communities. Compensation for damage to crops and trees due to the construction activities was at three stages: a) during foundation work for the towers, b) during tower erection, and c) stringing of power lines between towers. Compensation for damages caused during maintenance and repair are to be paid by IndiGrid. There is no formal grievance redressal system in place with IndiGrid to handle grievances from landowners (at least those from whom land was taken under direct negotiation). As reported the maintenance workers who work at the line and towers and conduct patrolling are the first point of contact between landowners and project. However, site observations and discussions reveal lack of communication between these two. This has also seen to be leading to unreported grievances among landowners. IndiGrid has informed landowners about restrictions of land use under the transmission line and towers. These are primarily height related restrictions, while landowners can continue to cultivate on this land. The landowners confirmed that they are aware of this; yet fewer landowners were seen to be using these land parcels for agriculture and horticulture. There has been no physical displacement under any of the 5 projects as reported and confirmed during site consultations. As observed in some of the records of compensation payment, persons without legal rights have also been paid compensation for their loss under the project. Indicating an inclusive approach in identifying project affected persons. <p><u>JTCL</u></p> <ul style="list-style-type: none"> Reportedly the project's construction activities resulted in tree cutting without any other damages. The impact was realised across 709 land parcels involving 480 landowners as reported. 	<p><u>All sites</u></p> <ul style="list-style-type: none"> IndiGrid to ensure that minimum/no damages are caused during the maintenance and repair activities of the line and towers. Any damages caused shall be compensated at the earliest, as per the percentage of market value specified for land and at market value for crops, trees, water bodies etc. Communication between project proponent and landowners should be streamlined and documented. Please refer to recommendations given in External Communications and Grievance Redressal Mechanisms in Table 5.1 and 5.2.1. Commission a Social Assessment by an independent third party to identify residual and ongoing impacts due to IndiGrid's operations on collectively/communally owned lands/assets and resources of IPs in project affected areas in general and Schedule V areas in each of the 5 transmission lines. Develop and implement a Social Management Plan (SMP) based on outcomes of the assessment to address ongoing community level impacts. 	High

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> • The updated information shared shows total payable compensation to be INR 42,18,077/-. The status of what proportion of this is paid is yet to be shared. Sample Demand Drafts could not be shared for review. • Consultations with select landowners indicate that their consent was obtained before erection of transmission line and towers on their lands. It is understood that this consent was taken verbally by project developer's representatives. And No Objection Certificates were signed after payment of compensation for the damages caused by construction. • Although construction stage certificates could not be made available for review, a sample declaration dated November 2021 was reviewed. This document essentially includes landowner's acknowledgement of the compensation paid against damages caused and declaration of no objection against the amount paid. • As reported, there are 6 pending litigations with respect to JTCL's land. Out of these 1 is in the Supreme Court (filed in 2015), 3 in High court (filed 2014, 2018, and 2020), and 3 in Sessions court (filed in 2016). 2 out of 6 cases are understood to have been filed after acquisition of the asset in 2017. All cases are pertaining to compensation claims for construction stage damages and lack of intimation about land procurement under project. <p><u>MTL</u></p> <ul style="list-style-type: none"> • Consultations with select landowners indicate that their consent was obtained before erection of transmission line and towers on their lands. It is understood that this consent was taken verbally by project developer's representatives. And actual No Objection Certificates were signed after payment of compensation for the damages caused by construction. • Although construction stage certificates could not be made available for review, sample NoC dated June 2021 was reviewed. This NoC essentially includes landowner's acknowledgement of the compensation paid against damages caused and declaration of no objection against the amount paid. • The compensation was paid by the developer for the crop and tree damages across 2,467 land parcels, involving 4,105 landowners, as reported. The compensation disbursement records show that majority of the payments were made during 2016, 2017, 2018; however, for 4 parcels payment was made in 2012 and for 2 parcels the payments date back to 1906 and 1909 as well. • Compensation amount of INR 9,30,19,194/- has been paid to project impacted due to land take and construction stage damages, as per the updated records shared for review. However, whether or not this is the total payable amount is not known. • It is understood that a litigation was filed against MTL (among other parties including District Collector, Kamareddy District; the Chairman and Managing Director, the REC Transmission Projects; the Union of India representative, Ministry of Energy; the State of Telangana representative, Revenue Department, Hyderabad) regarding compensation claim for erection of high tension line from farm lands. High Court ordered that MTL along with REC Transmission Projects 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>pays the compensation that would be fixed by the District Collector, Kamareddy District as compensation towards damages caused by erection of electric transmission towers and drawing high voltage transmission lines in and across the said lands. Secondary information states that MTL was directed to pay INR 0.47 million per case, which was paid by MTL. IndiGrid confirms that the case has been disposed off. Document showing payment made by MTL are not available with IndiGrid. Also, it could not be confirmed, if the issue was raised as a grievance prior to being filed as litigation.</p> <p><u>RTCL</u></p> <ul style="list-style-type: none"> Based on review of records, 3,360 land parcels with crop damages are located in Madhya Pradesh, while 1,528 land parcels with crop damages are located in Rajasthan; impacting 6,185 landowners. The compensation was disbursed by the developer between 2014, 2015, and 2016. Review of records shows that 85.4% out of total payable amount of INR 5,90,02,085/- has been paid to project impacted persons, while balance payment of INR 86,00,200 i.e. 14.6% is to be made. As per a recent update shared by IndiGrid 100% payment has been made. This could not be verified through review of updated records. Reportedly, there are no pending claims or litigations with respect to project land. <p><u>PKTCL</u></p> <ul style="list-style-type: none"> Consultations with select landowners indicate that their consent was obtained before erection of transmission line and towers on their lands. It is understood that this consent was taken verbally by project developer's representatives. And No Objection Certificates were signed after payment of compensation for the damages caused by construction. Although construction stage NOCs could not be made available for review, sample NoCs dated July 2021 were reviewed. These NoCs essentially include landowner's acknowledgement of the compensation paid against damages caused and declaration of no objection against the amount paid. The construction activities resulted in no other damages other than tree cutting, as reported. It is understood to have impacted 978 landowners across 980 land parcels. The compensation payments were made by the developer during 2015 and 2016. Though the land procurement timelines are not yet known, the payment records indicate the procurement was done before (or even during) 2015. The project developer's website mentions that the Kharagpur-Chaibasa line passes through Sama land. Sama are sacred groves dedicated to different deities and are composed of a vegetation of bamboo and/or Sal and other trees. These lands are worshiped by tribal as well as non-tribal in different areas. Based on the secondary information the line route was diverted to avoid passing through Sama 		

S.No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>land; however, where unavoidable the diversion of Sama land was undertaken through mutual consultations with relevant stakeholders³⁵.</p> <ul style="list-style-type: none"> • Consultations with persons from Santhal tribe (who worship the Sama land), near tower 45/9 on Kharagpur-Chaibasa line confirms that the line does not pass through or over Sama land. Consultations revealed that Gram Sabha was organised to take decision over diversion of Sama land for the project. As a result, the project avoided passing through the line. Presently, the community does not face any restrictions due to the project to access the Sama land. Reportedly, there are no pending claims or litigations with respect to land for this project. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> • Consultations with select landowners indicate that their consent was obtained before erection of transmission line and towers on their lands. It is understood that this consent was taken verbally by project developer's representatives. And actual No Objection Certificates were signed after payment of compensation for the damages caused by construction. • Consultations with landowners also indicate that, compensation payments to many was done in two instalments, during and after construction of tower on their land. In some cases, aggregators paid lesser amount than determined at the time of negotiation. The landowners then sought support from SDM and received balance amount of the amount originally promised. (Funds for these payments were disbursed by Sterlite to SDM). • In Chattisgarh state compensation for land and damages was paid, as mandated by the state. Whereas in Odisha compensation towards damages was paid, as per the applicable legal requirements. • All the landowners consulted during the visit have balance land under their possession/occupation besides the land given for tower construction or the land falling under the overhead lines. Therefore, consultations do not indicate cases of landlessness created. 		

³⁵ <https://www.sterlitepower.com/community/religious-beliefs-and-biodiversity-conservation-sterlite-power-case-study>

5.2.6 IFC PS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	Protection and Conservation of Biodiversity	<p>JTCL</p> <ol style="list-style-type: none"> The Project has not yet been subjected to a PS-compliant biodiversity impact and risk assessment. Natural habitats in and around the Project Site include tropical moist and dry deciduous forests & inland wetlands, while modified habitats in and around the Project Site include arable land, rural habitation & urban areas. As informed by the Client, the Project Site overlaps 490.806 ha of nationally designated legally protected area qualifying as Category VI IUCN Protected Area & potential natural habitat, of which the Bina-Jabalpur component of the Project overlaps 138.31 ha & the Jabalpur-Dharamjaygarh component overlaps 352.496 ha. The Project possesses the applicable Forest Clearances, the regulatory permit required for use of the said land for the said development. The 2 components of the Project were commissioned on 1 Jul 2015 & 14 Sep 2015 respectively, hence any Project-related conversion of the said potential natural habitat is likely to have occurred at least 6 years before the present time. At least 18 globally threatened TL-vulnerable species, comprising 1 mammal, 13 soaring birds and 4 water birds, potentially occur within the Project Site. The nearest Designated Area with respect to the Project Site is the Legally Protected Area & Internationally Recognized Area of Amarkantak Achanakmar Man & Biosphere Reserve, which, as per a Government of India map, is situated <100m of the nearest point on the Jabalpur-Dharamjaygarh component of the Project Site & may possibly overlap the Project Site. The nearest Key Biodiversity Area with respect to the Project Site is the Achanakmar Wildlife Sanctuary and Maniyari Reservoir KBA+IBA, which is situated approximately 9 km north of the nearest point on the Jabalpur-Dharamjaygarh component of the Project Site. distribution in Madhya Pradesh State, which contains approximately 75% of the JTCL Project Site, vulture sightings & suitable habitats are reported in significant proximity to the JTCL Project Site component situated in Madhya Pradesh. [See Figures J-4 & J-5] As per inputs received from a local avian expert, the Jabalpur-Dharamjaygarh component of the Project Site is situated approximately 16 km south of Aurapani Cliffs, a known nesting 	<p>JTCL</p> <ol style="list-style-type: none"> A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for the subspecies <i>Panthera tigris ssp. tigris</i> (Bengal Tiger) must be instituted for the Project. Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivity Maps for JTCL. [See Figures J-1 & J-2] Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project. A consultation must be conducted with the UNESCO MAB Secretariat to understand the proximity of the MAB to the Project Site & any Project-related risk to the conservation objectives <p>MTL</p> <ol style="list-style-type: none"> A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity 	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>habitat of 30 individuals of <i>Gyps indicus</i> (Indian Vulture, IUCN Red List Status: CR), which are known to have a home-range of over 100 km & may meet the lowest applicable CH trigger threshold.</p> <p>11. As per the IUCN range map for <i>Sypheotides indicus</i> (Lesser Florican or LF: IUCN Red List Status: CR), an approximately 30 km section of the Bina-Jabalpur component of the Project Site is situated within the non-breeding range of the LF.</p> <p>12. The LF is also one of the KBA trigger species for Kanha National Park KBA+IBA, situated approximately 30 km west of the nearest point on the Jabalpur-Dharamjaygarh component of the Project Site.</p> <p>13. As per a report (dated 2018) on the status of LF, published by Wildlife Institute of India (WII), the species is less likely to occur in or around the Project Site.</p> <p>14. As per inputs received from a local avian expert, the Jabalpur-Dharamjaygarh component of the Project Site is situated within a local avian migratory flyway, with significantly large migratory bird congregations occurring in inland wetlands situated within 20 km of the Project Site, the nearest being Mohanbatha, situated approximately 2 km north of the nearest point on the Jabalpur-Dharamjaygarh component of the Project Site [Tower No. 73/3 (DA+0)] & used mainly as a staging site during Oct-Nov.</p> <p>15. As per inputs received from the Forest Department, the Kopra Reservoir, an artificial inland wetland, situated approximately 15 km south of the nearest point on the Jabalpur-Dharamjaygarh component of the Project Site, is the largest congregation site for migratory birds in the vicinity of the said component of the Project Site.</p> <p>16. An approximately 3.36 km section of the Jabalpur-Dharamjaygarh component of the Project Site overlaps the nationally designated Kanha - Achanakmar Tiger Corridor, which is deemed a critical movement channel for <i>Panthera tigris ssp. tigris</i> (Bengal Tiger; IUCN Red List Status: EN) [See Annexure J-3]</p> <p>17. As per inputs received from local communities, the Tiger is occasionally sighted in and around the Project Site, as also, other associated wild faunal species, such as <i>Melursus ursinus</i> (Sloth Bear; IUCN Red List Status: VU).</p> <p>18. As per the report (dated 2017) of the Synchronized Elephant Population Estimation (India), there are approximately 247 individuals of <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN), a number exceeding the applicable CH trigger threshold, in northern Chhattisgarh, in which the Jabalpur-Dharamjaygarh component of the Project Site is situated.</p>	<p>Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks.</p> <p>2. Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species.</p> <p>3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same.</p> <p>4. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species.</p> <p>1. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivity Maps for MTL. [See Figures M-1 & M-2]</p> <p>5. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project.</p> <p><u>RTCL</u></p> <p>1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks.</p> <p>2. Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species.</p> <p>3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same.</p>	

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		<p>19. As per inputs received from the Forest Department, 122 individuals of the said species are recorded in the Bilaspur Forest Circle in northern Chhattisgarh, in which the Jabalpur-Dharamjaygarh component of the Project Site is situated.</p> <p>20. As per the IUCN Red List, the Project Site does not overlap the known range of the said species & is situated approximately 50 km west of the nearest point of the said range.</p> <p>21. As per inputs received from the Forest Department, in the Bilaspur region, in which part of the Jabalpur-Dharamjaygarh component of the Project Site is situated, recorded incidents of TL-related electrocution of the said species mainly involve power distribution lines, which tend to be of relatively lower voltage (11-66 kV).</p> <p>22. Several recent media reports (dated 2014-22) indicate that TL-related electrocution mortality constitutes a significant threat to the said species, as well as other faunal species.</p> <p>23. As per the outcome of a Critical Habitat Screening (CHS) Study, based mainly on desk-review & consultations, conducted with respect to the species identified as likely CH triggers for the Project, the Project Site overlaps a Critical Habitat of the subspecies <i>Panthera tigris ssp. tigris</i> (Bengal Tiger; IUCN Red List Status: EN).</p> <p>Sources: AECOM Survey; Mr. Ajay Sharma, Range Forest Officer (RFO), Achanakmar Tiger Reserve.</p> <p><u>MTL</u></p> <p>1. The Project has not yet been subjected to a PS-compliant biodiversity impact and risk assessment.</p> <p>2. Based on primary observations noted during the site visit in Feb 2022 &/or satellite imagery of the corresponding area as available on Google Earth, natural habitats in and around the Project Site include mainly tropical dry & moist forest and inland wetlands, such as rivers, streams, lakes & water storage areas, while modified habitats include arable lands, rural habitation & urban areas.</p> <p>3. A section of the Nizamabad-Shankarapalli component of the Project Site (involving at least 6 towers) overlaps collectively 15.625 ha of nationally designated legally protected areas qualifying as Category VI IUCN Protected Areas & potential natural habitats. [See Figure M-3]</p>	<p>4. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species.</p> <p>5. The said monitoring may focus on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map for RTCL or listed in Table 1 presenting details of the inland wetlands in proximity to the Project Site. [See Figure R-1 & R-2]</p> <p>6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project.</p> <p><u>PKTCL</u></p> <p>1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks.</p> <p>2. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for <i>Elephas maximus</i> (Asian Elephant), must be instituted for the Project.</p> <p>3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same.</p> <p>4. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species.</p> <p>5. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map for PKTCL. [See Figure P-1 & P-2]</p> <p>6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project.</p>	

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ol style="list-style-type: none"> 4. The Project possesses the applicable Forest Clearance, the regulatory permit required for use of the said land for the said development. 5. The 2 components of the Project were commissioned on 14 Oct 2017 & 14 Dec 2017 respectively, hence all or part of any Project-related conversion of the said potential natural habitat can have occurred within 5 years before the present time. 6. A few sections of the Nizamabad-Shankarapalli component of the Project Site (collectively involving at least 49 towers) overlap sections of the eco-sensitive zone of the Pocharam Wildlife Sanctuary (PWLS), with the collective length of the overlap being 13.05 km. [See Figure M-4] 7. At least 8 TL-vulnerable species, comprising 1 bustard, 5 soaring birds and 2 water birds, potentially occur within the aerial envelope of the Project Site. 8. As per the IUCN species range map, the Nizamabad-Shankarapalli component of the Project Site is situated within the non-breeding range of the concerned bustard species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF: IUCN Red List Status: CR). 9. A report (dated 2018) on the status of LF, published by Wildlife Institute of India (WII) does not cover Telangana state, in which the Project Site is situated. 10. As per inputs received from the local community of Kamareddy, near the Nizamabad-Shankarapalli component of the Project Site, LF is sighted during the monsoon & post-monsoon seasons (approximately June to November) nearly every year. The behaviour of the said sighted birds, as described by the interviewees, was closely aligned with the documented breeding behaviour of LF. 11. The area in and around some sections of the Nizamabad-Shankarapalli component of the Project Site contains suitable habitat types with respect to LF in terms of grasslands & arable lands supporting low intensity rain-fed cultivation of Rice (<i>Oryza sativa</i>), Maize (<i>Zea mays</i>) & occasionally, Groundnut (<i>Arachis hypogaea</i>). 12. Based on primary observations noted during the site visit in Feb 2022, several natural or artificial inland wetlands, including rivers, streams, lakes, pools & water storage areas, serving as habitats for migratory &/or congregatory water birds, are situated in & around the Project Site. 13. An approximately 1 km section of the Nizamabad-Shankarapalli component of the Project Site is situated approximately 950m from the northern boundary of a designated area, namely Pocharam Wildlife Sanctuary KBA+IBA, an internationally recognized area, the KBA triggers being 1 soaring bird species, 	<p><u>OGPTL</u></p> <ol style="list-style-type: none"> 1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. 2. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for <i>Elephas maximus</i> (Asian Elephant), must be instituted for the Project. 3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. 4. The said monitoring would need to cover at least the chief avian migratory and breeding seasons with respect to the Project Site and involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. 5. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map for PKTCL. [See Figure O-1 & O-2] 6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project. 	

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>namely <i>Gyps indicus</i> (Indian Vulture, IUCN Red List Status: CR), & 1 water bird species, namely <i>Rynchops albigollis</i> (Indian Skimmer, IUCN Red List Status: EN).</p> <p>14. An approximately 5 km section of the Nizamabad-Shankarapalli component of the Project Site is situated approximately 5.5 km from the eastern boundary of a designated area, namely Manjira Wildlife Sanctuary (MWLS), a legally protected area & Manjira Wildlife Sanctuary KBA+IBA, an internationally recognized area, the KBA triggers being mainly water birds as a species group.</p> <p>15. As per inputs received from the Forest Department, many soaring bird species, especially eagles, are reported from the Pocharam Wildlife Sanctuary (PWLS), while large congregations of migratory waterbirds are reported from Pocharam Reservoir, a water storage area within Pocharam Wildlife Sanctuary (PWLS), as well as Simapally Waterfalls or Kalvarvad Check Dam, a water storage area overlapped by the Project Site.</p> <p>16. As per data available on citizen science database, ebird, several species of soaring birds, including eagles, harriers, buzzards & falcons, as well as congregations of several species of migratory water birds, including storks, ibises, and ducks, occur regularly in PWLS, MWLS & Simapally Waterfalls or Kalvarvad Check Dam.</p> <p>17. As per the outcome of a focused Critical Habitat Screening (CHS) Study, based mainly on desk-review & consultations, presence of Critical Habitat with respect to the Project has been ruled out for all but 1 species, identified as potential CH triggers, namely <i>Sypheotides indicus</i> (Lesser Florican or LF).</p> <p>Sources: AECOM Survey; Mr. Manoj Kumar Forest Range Officer (FRO), Medak region; Ms. M. Chandana FRO, Indalwai Range</p> <p><u>RTCL</u></p> <p>1. The Project has not yet been subjected to a PS-compliant biodiversity impact and risk assessment.</p> <p>2. Natural habitats in and around the Project Site include tropical dry deciduous forests, shrublands, grasslands, rocky areas & inland wetlands, while modified habitats in and around the Project Site include arable land, rural habitation, urban areas & excavations.</p> <p>3. At least 15 TL-vulnerable species, comprising 1 bustard, 9 soaring birds and 5 water birds, potentially occur within the aerial envelope of the Project Site.</p>		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ol style="list-style-type: none"> 4. As informed by the Client, an approximately 5 km section of the Project Site (between Tower Nos. 2/3 to 4/5) overlaps 27.37 ha of a nationally designated legally protected area qualifying as a Category VI IUCN Protected Area. 5. The Project possesses the applicable Forest Clearance, the regulatory permit required for use of the said land for the said development. 6. The Project was commissioned on 1 Mar 2016, hence any Project-related conversion of the said potential natural habitat is likely to have occurred over 5 years before the present time. 7. Based on primary observations noted during the site visit in Feb 2022, the concerned legally protected area represents natural habitat that is slightly degraded owing to spread of the invasive alien species <i>Lantana camara</i>. 8. The concerned habitat is situated on a ridgetop & ridge slopes overlooking cultivated or fallow arable lands, which constitutes a preferred foraging habitat type for soaring birds. 9. As per the IUCN species range map, an approximately 20 km section at the northern end of the Project Site is situated within the breeding range of the concerned bustard species, namely <i>Syphotides indicus</i> (Lesser Florican or LF: IUCN Red List Status: CR). 10. As per a report (dated 2018) on the status of LF, published by Wildlife Institute of India (WII), the said species is less likely to occur in or around the Project Site. 11. As per inputs received from the local community, soaring birds are sighted around the ridge, cliffs in the said ridge contain roosting sites of vultures & vultures are observed to feed on livestock carcasses in the area. 12. Based on primary observations noted during the site visit in Feb 2022, several natural or artificial inland wetlands, including a river, streams, lakes, pools, water storage areas & ponds, serving as habitats for migratory &/or congregatory water birds, are situated in & around the Project Site. 13. The nearest Designated Area is Gandhi Sagar Wildlife Sanctuary and Reservoir KBA+IBA, which is situated 1 km west of the nearest point on the Project Site boundary, the KBA trigger being water birds as a species group. 14. Two other Designated Areas, namely Jawahar Sagar Sanctuary KBA+IBA & Alniya Dam KBA+IBA, with the respective KBA triggers being 4 globally threatened vulture species & water birds as a species group, are situated approximately 15 km & 20 km northeast of the nearest points on the Project Site boundary. 		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>Sources: AECOM Survey; Residents of Ekalingpura Village; Site-based Project personnel</p> <p><u>PKTCL</u></p> <ol style="list-style-type: none"> 1. The Project has not yet been subjected to a PS-compliant biodiversity impact and risk assessment. 2. Natural habitats in and around the Project Site include tropical moist forests & inland wetlands, while modified habitats in and around the Project Site include arable land, rural habitation & urban areas. 3. At least 12 TL-vulnerable species, comprising 1 mammal, 10 soaring bird and 1 water bird species, potentially occur in and around the Project Site. 4. As informed by the Client, a few sections of the Project Site collectively overlap 115.863 ha of nationally designated legally protected areas qualifying as Category VI IUCN Protected Areas & potential natural habitats, of which the Ranchi-Purulia component overlaps 71.789 ha & the Chaibasa-Kharagpur component overlaps 44.074 ha, including parts of Dumriya Hill Forest - Gorumahisani Mountain Range and Banka Reserve Forest. 5. The Project possesses the applicable Forest Clearances, the regulatory permit required for use of the said land for the said development. 6. The 2 components of the Project were commissioned on 18 Jun 2016 & 7 Jan 2017 respectively, hence any Project-related conversion of the said potential natural habitat is likely to have occurred over 5 years before the present time. 7. The Purulia end of the Ranchi-Purulia component of the Project Site is situated in significant proximity to the Ajodhya Hill Forest Reserve, which is part of the Mahilong-Kalimati Elephant Corridor identified by the Wildlife Trust of India (WTI), used by approximately 32 individuals & deemed a critical movement channel for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN). 8. The Project Site is situated in significant proximity to 4 Elephant Corridors, deemed critical movement channels for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN) populations of Odisha, Jharkhand, & West Bengal states of India & collectively used by approximately 375 individuals: (a) Dumriya RF to Nayagram RF (b) Mahilong to Kalimati (c) Chandil to Matha (and (d) Dalma to Chandil. [See Figure P-3] 9. As per inputs received from the Forest Department, movement of <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN) individuals in the region occurs year-round. 		

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		<p>10. As per inputs received from the Forest Department, recorded incidents of TL-related electrocution of <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN) are related mainly to power distribution lines, which tend to be of relatively lower voltage (11-66 kV).</p> <p>11. Several recent media reports (dated 2014-22) indicate that TL-related electrocution mortality constitutes a significant threat to the said species, as well as other faunal species.</p> <p>12. As per inputs received from local forest-dwelling communities, they do not recall any incident of TL-related collision/electrocution of wild fauna.</p> <p>13. Hazaribag district of Jharkhand state, situated approximately 40 km north of the Ranchi-Purulia component of the Project Site, is reported to be a significant vulture habitat, with approximately 40 roosting and nesting sites of vultures.</p> <p>14. Based on a report (dated 2016) on the Asian Waterbird Census, 6 inland wetlands collectively used by approximately 13,000 waterbirds are situated in proximity to the Project Site: (a) Chandil Dam (b) Hatia Dam (c) Getalsud Dam (d) Kanke Dam (e) Sitarampur Dam (f) Dimna Lake [Marked in Annexures -- as Waterbird Habitats]</p> <p>15. As per the outcome of a Critical Habitat Screening (CHS) Study, based mainly on desk-review & consultations, conducted with respect to the species identified as likely CH triggers for the Project, the Project Site overlaps a Critical Habitat of the subspecies <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN).</p> <p><i>Sources: AECOM Survey; Mr. A.K. Chaudhari, ACF, Jamshedpur Division; Mr. Aditya Narayan, DFO, Saraikela Division</i></p> <p><u>OGPTL</u></p> <p>1. The Project has not yet been subjected to a PS-compliant biodiversity impact and risk assessment.</p> <p>2. Natural habitats in and around the Project Site include tropical moist forests & inland wetlands, while modified habitats in and around the Project Site include arable land, rural habitation & urban areas.</p> <p>3. At least 12 TL-vulnerable species, comprising 1 mammal, 2 bustard, 9 soaring bird and 5 water bird species, potentially occur in and around the Project Site.</p> <p>4. As informed by the Client, a few sections of the Project Site collectively overlap 196.434 ha of nationally designated legally</p>		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>protected areas qualifying as Category VI IUCN Protected Areas & potential natural habitats, of which the Raipur-Jharsuguda component overlaps 166.3 ha & the Jharsuguda-OPGC component overlaps 30.134 ha.</p> <ol style="list-style-type: none"> 5. The Project possesses the applicable Forest Clearances, the regulatory permit required for use of the said land for the said development. 6. The 2 components of the Project were commissioned on 30 Aug 2017 & 4 Apr 2019 respectively, hence any Project-related conversion of the said potential natural habitat is likely to have occurred less than 5 years before the present time. 7. An ~ 11 km section of the Project alignment overlaps a Designated Area, namely the 'Heerakund Reservoir and Debrigarh WLS' KBA & IBA, part of which is a legally protected area qualifying as a Category II IUCN Protected Area. 8. An approximately 25 km section of the Raipur-Jharsuguda component of the Project Site overlaps the Hemgir Forest Range, a local Elephant Corridor connecting elephant habitats of Korba & Surguja areas in northern Chhattisgarh to those of Raigarh & Rengali in southern Chhattisgarh and northern Odisha, reportedly used by approximately 120 individuals (~ 50% of the applicable CH trigger threshold) & deemed a critical movement channel for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN). 9. The Project Site is situated in significant proximity to 3 Elephant Corridors identified by the Wildlife Trust of India (WTI) as critical movement channels for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN) populations of Odisha & Chhattisgarh states of India [See Figure O-2] 10. Several recent media reports (dated 2014-22) indicate that TL-related electrocution mortality constitutes a significant threat to the said species, as well as other faunal species. 11. As per inputs received from the local community of Negipali village, situated near the Jharsuguda-OPGC component of the Project Site, <i>Ardeotis nigriceps</i> (Great Indian Bustard or GIB; IUCN Red List Status: CR) is sighted around the village nearly every year during the post-monsoon period (approximately Oct-Nov) after the harvest of the monsoon crop. 12. As per the IUCN Red List geographic distribution map of GIB, Negipali village is situated in a part of the GIB's historic range where it is currently deemed 'Possibly Extinct'. 13. As per inputs received from the local community of Negipali village, situated near the Jharsuguda-OPGC component of the Project Site, <i>Leptoptilos javanicus</i> (Lesser Adjutant or LA; IUCN Red List Status: VU) is sighted around the village regularly, with approximately 10-15 individuals observed perching frequently 		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>on the transmission towers of the Project & numbers observed to be steadily increasing each year in the recent past.</p> <p>Sources: AECOM Survey; Mr. Lalit Kumar Patra, DFO, Jharsuguda Division; Pradeep Mirase, DFO, Sundargarh Division</p>		
2.	Management of Ecosystem Services	<p><u>JTCL</u></p> <ol style="list-style-type: none"> Based on primary & secondary data recorded during the site visit in Feb 2022, the area in & around the Project Site provides local forest-dwelling potentially Indigenous People communities with priority provisioning services, including water, wild foods, such as fruits of <i>Diospyros embryopteris</i> (Tendu), <i>Embllica officinalis</i> (Amla or Indian Gooseberry) & <i>Mangifera indica</i> (Mango), flowers, fruits & seeds of <i>Madhuca indica</i> (Mahua), seeds of <i>Shorea robusta</i> (Sal) & <i>Buchanania lanzan</i> (Chironji) and meat of <i>Sus scrofa</i> (Wild Pig) & <i>Hystrix indica</i> (Indian Porcupine), besides honey, capture fishery, medicinal plants, such as <i>Terminalia bellerica</i> (Barra), <i>Terminalia chebula</i> (Harra) & <i>Pongamia pinnata</i> (Karanj), fuelwood & soil for cultivating crops, mainly <i>Oryza sativa</i> (Rice). As per inputs received from the Forest Department, Indigenous People communities inhabiting the forests in and around the Project Site collect many forest resources, such as water, wild foods, medicinal plants, and secondary use plant parts, such as leaves of <i>Diospyros embryopteris</i> (Tendu) & <i>Shorea robusta</i> (Sal), or animal products such as lac. <p><u>MTL</u></p> <ol style="list-style-type: none"> Based on primary & secondary data recorded during the site visit in Feb 2022, the area in & around the Project Site provides local communities with priority provisioning services, such as water for domestic use & irrigation, capture & culture fisheries, fuelwood, fodder & soil for cultivating crops, mainly <i>Oryza sativa</i> (Rice). Waterbodies in & around the Project Site also provide cultural services, in terms of recreation & religious rituals. <p><u>RTCL</u></p> <ol style="list-style-type: none"> Based on primary & secondary data recorded during the site visit in Feb 2022, the area in & around the Project Site provides local communities with priority provisioning services, such as cultivable soil & water for irrigation. 	<p><u>JTCL</u></p> <ol style="list-style-type: none"> It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on IP communities. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services. <p><u>MTL</u></p> <ol style="list-style-type: none"> It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on any IP communities. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services. <p><u>RTCL</u></p> <ol style="list-style-type: none"> It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity baseline and risk and impact assessment, with an emphasis on IP communities. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services. <p><u>PKTCL</u></p>	Medium

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>2. Secondary data indicates that the large water storages around the Project Site, namely Gandhi Sagar Reservoir, Rana Pratap Sagar Reservoir and Rewa Dam Reservoir serve as important resources for large-scale culture fisheries, providing a significant priority provisioning service to the local communities.</p> <p><u>PKTCL</u></p> <p>1. As per inputs received from forest-dwelling communities near Dumariya Forest, fuelwood is the most important forest source. Based on primary & secondary data recorded during the site visit in Feb 2022, the area in & around the Project Site provides local communities with priority provisioning services</p> <p><u>OGPTL</u></p> <p>1. As per inputs received from the local communities, the area in & around the Project Site provides priority provisioning services, such as water for domestic use & irrigation, wild foods, such as flowers, fruits & seeds of <i>Madhuca indica</i> (Mahua), seeds of <i>Shorea robusta</i> (Sal) & flowers of an unidentified species (locally called 'Geril Phool'), riverine capture fishery, fuelwood and soil for cultivating crops, mainly <i>Arachis hypogea</i> (Groundnut or 'Badam') & <i>Cicer arietinum</i> (Bengal Gram or 'Chana').</p>	<p>1. It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity baseline and risk and impact assessment, with an emphasis on IP communities.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p> <p><u>OGPTL</u></p> <p>1. It is recommended that priority provisioning ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity baseline and risk and impact assessment, with an emphasis on IP communities.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p> <p>3. The KBA Secretariat may be consulted to determine presence of CH within the Project Site or Project AoI with respect to the Heerakund Reservoir & Debrigarh WLS KBA+IBA"</p>	

5.2.7 IFC PS-7: Indigenous Peoples

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	In circumstances where a proposed project is likely to have impacts on indigenous Peoples	<p>JTCL</p> <ul style="list-style-type: none"> Two FRA certificates obtained from Kabirdham district in October 2012 & September 2013, and one obtained from Janjgiri-Champa district in July 2013 were shared for review. These confirm completion of the due process under the act. FRA certificate obtained from Mandla district in June 2014. The certificate confirms that the complete process for identification and settlement of rights under the act has been carried out. However, there are other clauses in the certificate that nullify the applicability of the act and its requirements. Clause 1: The certificate refers to a MoEF&CC notification dated February 2013 that exempts transmission line projects from complying with the act. Clause 2: The certificate mentions that forest diversion required under section 3(2) of the FRA 2006 is completed. However, the section applies to cases of diversion wherein less than 1 hectare of land is required whereas the certificate is obtained for 42.42 hectares of forest land. The abovementioned contradictions can be clarified with minutes of the consultations undertaken for obtaining these FRA certificates and on process of identification and settlement of rights entailed and to gain clarity on the process elements. Furthermore, the certificate confirms that where applicable rights of Primitive Tribal Groups and Pre-Agricultural communities were settled as per the act, indicating habitation of such communities in and around the project in Mandla district. FRA certificate obtained from Jabalpur district in July 2014. The certificate mentions that the complete process for identification and settlement of rights under the act has been carried out. However, the certificate also refers to a MoEF&CC notification dated February 2013 that exempts transmission line projects from complying with the act. Ambiguity regarding process followed to obtain FRA certificates, and unavailability of Gram Sabha resolutions in schedule V areas, leaves a gap in understanding of project's compliance status against critical regulations such as FRA 2006 and PESA 1996. Considering presence of forest dwellers in the vicinity and the line passing through fifth schedule areas, IndiGrid is likely to interact with the Indigenous Peoples (IP) in the region during maintenance and repair activities, in general with respect to safety in the surrounding areas of the high voltage transmission line, use of village roads and forest roads used by IPs etc. Assuming that gram sabhas were not held for these lines; there is no process under the law to retrospectively comply with these requirements as the purpose of the requirements is to take 'prior' and 'informed' consent. However, it is likely for more litigations to be filed against the projects that were developed without meeting the requirements. (Court Order to case filed by Bikash Lakra and Others 	<p>Common for all sites</p> <ul style="list-style-type: none"> To avoid legacy issues revolving these ambiguities; to ensure mitigation of any negative impact on IPs; and to be able to effectively resolve any grievances from Scheduled Tribe and forest dwelling communities a threefold system is recommended: <ul style="list-style-type: none"> Roll out the GRM at each asset level, and communicate its purpose and process at each Gram Panchayat where FRA and PESA have been triggered; As part of the asset specific SEP – map all IPs involved in the project, create a socio-economic profile of each of these groups, assess their expectations from and influence on the project and project proponent, and determine strategies to manage positive communication with these groups throughout the project lifecycle; It is recommended to conduct a Social Assessment study by an independent third party to identify residual and ongoing impacts due to IndiGrid's operations on collectively/communally owned lands/assets and resources of IPs in project affected areas in general and Schedule V areas in each of the 5 transmission lines. Develop and implement a Social Management Plan (SMP) based on outcomes of the assessment to address ongoing community level impacts 	High

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>I OGPTL might be helpful to set precedence and gain leaning of disposing off such future claims/litigations without hampering the project or the IPs.)</p> <ul style="list-style-type: none"> • Due to the abovementioned contradiction, there is lack of understanding on what the process of identification and settlement of rights entailed? The Ministry of Tribal Affairs notification dated March 2014 stipulates the need to undertake due process under FRA 2006 for all categories of projects, therefore, invalidating the preceding notification of February 2013. Minutes of the consultations undertaken for obtaining these FRA certificates are requested for review, to gain clarity on the consent process followed. • There were no recognised rights of Primitive Tribal Groups and Pre-Agricultural communities identified under this certificate. • Total 29 FRA certificates have been obtained from Dindori district, all confirming completion of process of settlement of rights recognised under the act. All of these certificates also confirm settlement of rights of the Primitive Tribal Groups and Pre-Agricultural communities. • The total number of rights vested and recognised, how many were individual and how many community rights etc. is not known for any of the FRA certificates mentioned here. • Approximately 80km of the total TL length passes through Schedule V areas. These areas comprise of 86 villages (and more under Kota revenue circle that are presently not known) across 3 districts in 2 states. • With respect to Gram Sabha consent under the Panchayats (Extension to Scheduled Areas) Act, 1996, the resolutions/consent documents are yet to be shared for review. • There is presence of forest dwelling communities in and around the project at JTCL, as observed during the site visit. They mainly belong to Gond and Dhoba Tribal communities. Based on sample consultations, there are no ST landowners impacted by the project in the 5-6km stretch from the Bangar village where consultation was undertaken. <p><u>MTL</u></p> <ul style="list-style-type: none"> • A FRA certificate obtained from Nizamabad district in July 2016 was shared for review. The certificate confirms that the complete process for identification and settlement of rights under the act has been carried out. However, there are other clauses in the certificate that nullify the applicability of the act and its requirements. • Clause 1: The certificate refers to a MoEF&CC notification dated February 2013 that exempts transmission line projects from complying with the act. • Clause 2: The certificate mentions that forest diversion required under section 3(2) of the FRA 2006 is completed. However, the section applies to cases of diversion wherein less than 1 hectare of land is required whereas the certificate is obtained for 15.625hectares of forest land. • Due to the abovementioned contradictions there is lack of understanding on what did the process of identification and settlement of rights entailed. To gain clarity 		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>on the process elements, minutes of the consultations undertaken for obtaining these FRA certificates are requested for review.</p> <ul style="list-style-type: none"> • There were no recognised rights of Primitive Tribal Groups and Pre-Agricultural communities identified under this certificate. • The total number of rights vested and recognised, how many were individual and how many community rights etc. is not known for any of the FRA certificates mentioned here. • The project has impacted persons belonging to Schedule Tribe communities due to land take³⁶. Based on consultations with an ST landowner (belonging to Goud Tribal community) at site and as confirmed by the project management, the process followed for land take from ST landowners was reportedly same as that followed with non-ST landowners. • The transmission line does not pass through a Schedule V area. <p><u>RTCL</u></p> <ul style="list-style-type: none"> • A correspondence between concerned government departments with respect to FRA certificate for the project in Chittorgarh district between March and April 2014 was shared for review. These letters confirm the conditions for issuing a FRA certificate to the project. The FRA certificate issued is yet to be received for confirmation. • The total number of rights vested and recognised, how many were individual and how many community rights etc. is not known for the FRA certificate mentioned here. • The transmission line does not pass through a Schedule V area. <p><u>PKTCL</u></p> <ul style="list-style-type: none"> • Two FRA certificates have been shared for review. One obtained from Seraikela-Kharsawan district in September 2014, and another obtained from East Singhbhum district in April 2015. Both the certificates mention that the complete process for identification and settlement of rights under the act has been carried out. However, there are other clauses in the certificates that nullify the applicability of the act. The 2015 certificate refers to a MoEF&CC notification dated February 2013 that exempts transmission line projects from complying with the act. • Due to the abovementioned contradiction, there is lack of understanding on what the process of identification and settlement of rights entailed. • A Ministry of Tribal Affairs notification dated March 2014 stipulates the need to undertake due process under FRA 2006 for all categories of projects, therefore, invalidating the preceding notification of February 2013. Minutes of the consultations undertaken for obtaining these FRA certificates are requested for review, to gain clarity on the consent process followed. 		

³⁶ Although the total number of ST landowners impacted by the project is not known, the records show at least 61 landowners belonging to Goud tribal community.

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<ul style="list-style-type: none"> • There were no recognised rights of Primitive Tribal Groups and Pre-Agricultural communities identified under these certificates. • The total number of rights vested and recognised, how many were individual and how many community rights etc. is not known for any of the FRA certificates mentioned here. • Approximately 158km of line passe through Schedule V area. These areas involve 367 villages across 4 districts in Jharkhand state. With respect to Gram Sabha consent under the Panchayats (Extension to Scheduled Areas) Act, 1996, the resolutions/consent documents are yet to be shared for review. • The project has impacted persons belonging to Schedule Tribe communities due to land take. Based on consultations with ST landowners at site and as confirmed by the project management, the process followed for land take from ST landowners was reportedly same as that followed with non-ST landowners. <p><u>OGPTL</u></p> <ul style="list-style-type: none"> • FRA certificates for locations in Bemetara, Jharsuguda, Raigarh, Sundargarh and Bilaspur districts have been issued to the project. While these certificates state that rights under FRA have been settled for the project alignment, they also refer to the MoEFCC notification of 2013 offering relaxation to linear projects to follow these processes. • The total number of rights vested and recognised, how many were individual and how many community rights etc. is not known for any of the FRA certificates mentioned here. • There were no recognised rights of Primitive Tribal Groups and Pre-Agricultural communities identified under this certificate. • Unavailability of FRA or PESA related documents with government officials, indicate gram sabhas were not conducted for this project. • Consultations with few forest dwellers indicate that project has not imposed or induced any restrictions over access to or usage of forest and forest produce to the locals. The dependency on forest in the areas visited, is reportedly limited to collection of fuelwood. • There were no recognised rights of Primitive Tribal Groups and Pre-Agricultural communities identified under this certificate. • There are 3 pending litigations with respect to the land under this project. Two of these are filed against OGPTCL in 2017 and 2018; whereas it is a party to one litigation filed against the state of Chhattisgarh in 2018. In two of the cases petitioners have demanded for diversion of the transmission line from their land whereas in one case, the petitioner has claimed compensation for the right of way taken for the project. Two cases are pending at High court and one at District court. Secondary information shows another litigation against OGPTL in Orissa High Court against construction of transmission line through forest area without obtaining consent from Gram Sabha. The matter has been disposed off, as 		

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>reported by IndiGrid; though a copy of order under which this was disposed off could not be made available for review.</p> <p><u>All sites</u></p> <ul style="list-style-type: none"> Both FRA and PESA acts require prior informed written consent (aligning with FPIC requirements) to be obtained from local governing bodies before development of projects in villages that fall under these areas. The local governing bodies being Gram Sabhas, which are empowered to take decisions about use of their land and resources. There is unavailability of annexures/minutes of gram sabha consultations/any other documentary evidence that shows processes of vesting and recognition of rights (both community and individual) under the FRA are complete. Moreover, the FRA certificates that said to have completed the process of vesting and recognition of rights also refer to a MoEFCC's notification that exempts linear projects from conducting this process; raising a concern of whether due process of recognition and distribution of titles in the area proposed for diversion has been carried out; or was it considered not required. In addition, there is lack of awareness among majority landowners, forest dwellers, and forest officials about Gram Sabhas held under FRA for the project. Therefore, the process followed to issue FRA certificates to the projects cannot be ascertained at this stage. If FRA certificates are observed to have been issued without undertaking Gram Sabhas of the eligible villages, the Sub-Divisional Magistrate (SDM) has the power to invalidate the certificates; and therefore, questioning the Forest Clearance itself. Presently, there is observed to be lack of awareness among locals and government officials regarding project's FRA compliance. 		

5.2.8 IFC PS-8: Cultural Heritage

Gap assessment vis-a-vis IFC Performance Standards Framework 2012 and EHS General and Sector Specific Guidelines

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
1.	In circumstances where a proposed project is likely to have impact on cultural heritage for current and future generations.	<p><u>JTCL</u></p> <ul style="list-style-type: none"> Within 2.35km of aerial distance towards north east direction of the transmission line tower 175/2 is Chausath Yogini Temple in Jabalpur district of Madhya Pradesh. It is a religious structure dedicated to female yoga masters in Hindu religion. The structure is a circular lodge, situated on a hilltop above river Narmada in Bedaghat town in Jabalpur district. It is known to be built in by the Kalachuri dynasty during 10th century. There is limited reliable information in the public domain about number of visitors and any major events that potentially take place at this site. The site level consultations could not confirm significance of any potential festivals that may be arranged at this site. However, during O&M stage activities, the project is not likely to have major adverse impacts on the site or related activities. From discussions with the project staff it is understood that there were no impacts of the project on the site and vis-à-vis. <p><u>MTL</u></p> <ul style="list-style-type: none"> Based on secondary information review, and interaction with locals during site visit it is understood that there are no sites of cultural or historical significance within 5km of the transmission corridor. <p><u>RTCL</u></p> <ul style="list-style-type: none"> Based on secondary information review, and interaction with locals during site visit it is understood that there are no sites of cultural or historical significance within 5km of the transmission corridor. <p><u>PKTCL</u></p> <ul style="list-style-type: none"> The sacred groves called Sama are in close proximity to the transmission line at near tower 45/9, as confirmed by IndiGrid and observed during site visits. Based on secondary information review, and interaction with locals during site visit it 	<p><u>Linked to PS7 Recommendation</u></p> <p>IndiGrid is recommended to develop include special engagement strategies and needs based CSR interventions for the Indigenous Peoples. These IPs should also include Sama worshipers in PKTCL asset.</p>	High

S. No.	Aspect	Observations/Gaps/Risks	Recommendation	Priority
		<p>is understood that there are no other sites of cultural or historical significance within 5km of the transmission corridor.</p> <p><u>OGPTL</u></p> <ul style="list-style-type: none"> Based on secondary information review, there are no sites of cultural or historical significance within 10km of the transmission corridor. 		

6. Environment and Social Corrective Action Plan

The present section delineates the compliance status of gaps identified in above gap assessment table as per Priority of issues. The following Environmental and Social Corrective Action (ESCAP) Plan has been developed to address the identified risks and issues.

Table 6-1: Environment and Social Corrective Action Plan for the Project

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
A Regulatory Risks and Issues						
1.	Permits/Licences/NOC	Medium	<p>All Sites</p> <ul style="list-style-type: none"> Implement procedures to store all hazardous materials and wastes in designated areas with adequate secondary containment and dispose hazardous wastes through authorized entities in accordance with host country requirements. Authorization on the same should be obtained at a site-specific level 	Evidence of proper hazardous waste management photographs and status report from each SPV, verified by EHSS monitoring	Project Management	Within 6 months of commitment
B IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts						
2	ESMS Policies and Procedures	Medium	<p>Corporate and All Sites</p> <ul style="list-style-type: none"> IndiGrid should develop Operation and Maintenance manual for substation equipment and EHV Transmission Line including: <ul style="list-style-type: none"> Maintenance of EHV sub-grid Maintenance for EHV transformers, circuit breakers Maintenance for protection and metering and switch yard and equipment Earthing and maintenance schedule Site Specific E & S reports, as identified in ESMS should be prepared. Site Specific ESMP should be prepared, as stated in ESMS. Internal and External Audits should be conducted and reported, as included in the ESMS. 	Operation and Maintenance Manual	Project Management	6 months
			<ul style="list-style-type: none"> IndiGrid should develop and implement a Contractor Management Procedure for all its contractors (and update its contracts with them appropriately) that will cover legal environmental and social obligations as well as cascading of the relevant ESMS requirements on developing and implementing ESMPs, labour and working conditions aligned with PS2, stakeholder engagement and grievance management processes as well as monitoring and reporting on these aspects. The IndiGrid HSE Manual to be a part of all Contracts with sub-contractors and compliance to which will be monitored as a part of the EHSS monitoring. 	Contractor Management Procedure Updated Contracts with O & M Contractors	Project Management	Within 12 months of commitment
			<ul style="list-style-type: none"> The ESMS and, where applicable the Employee Policy Manual, will be revised to include a) Staff Grievance mechanism; b) GBV procedures, ensuring anon, confidential and survivor centric handling of grievances, as well as training to staff handling such matter; c) a policy on Freedom of Association, d) policy against gender-based discrimination at work and e) a Retrenchment Policy. Updated Employee Policy Manual will be accessible to all employee and workers via the "Zoho People" portal. 	Updated ESMS and Employee Manual	Project Management	Within 6 months of commitment
			<ul style="list-style-type: none"> Appoint an EHSS lead at the Corporate Level who will be overall responsible for the implementation of the ESMS and obligations under the ESAP. Designate and define clear responsibilities for Regional EHSS Managers to oversee E & S performance and ESAP implementation for the assets in the portfolio EHS Managers, Social Managers and O & M Team will be trained on the ESMS, ESMP, Grievance Management and SEP. 	EHSS Lead appointed Regional EHSS Managers have clearly defined responsibilities to oversee EHSS performance for assets in the portfolio. Training records	Project Management	Within 6 months of commitment

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
						Within 12 months of commitment
3	HSE policy	Low	EHS policy to be displayed at all sites in English as well as local language.	Display of ESH policy at site	Project Management	6 months
4	Development of EHS and Social Management Programs and their implementation	Medium	<p>Corporate</p> <ul style="list-style-type: none"> o Site Specific ESMP to be prepared and documented. o IndiGrid to undertake internal audits to assess labour related compliances against applicable labour laws and ILO ratifications of India. The Corporate level HR/Administration Department should develop this Audit Protocol and the asset level Contractor Management Team should undertake these Audits and report back to the Corporate HR. o It is recommended that IndiGrid appoints or identified among the existing staff at Regional level, a dedicated Contractor Management team with knowledge of labour regulations and contractor management. Contractor Management team that will report to the Corporate HR/Administration Department as well as facilitate ESMS implementation with the Corporate level Contracts team. o IndiGrid shall prepare a detailed EHSS protocol agreed with lender to drive internal monitoring on E & S performance. This will be an annual monitoring, the findings of which will be shared with lender. The EHSS monitoring also includes the implementation of the SEP and GM at each of the 5 assets o IndiGrid is recommended to identify Stakeholder Engagement/Public Relations person at asset level who can work under the Regional Manager currently responsible and formally assign responsibilities of community engagement and liaisoning at asset level to the person 	ESMP, SEP and Grievance Mechanism documents at each asset. Internal EHSS Assessment Report	Project Management	Within 12 months of commitment
5	Stakeholder Engagement, Grievance Redressal mechanism	Medium	<p>Corporate</p> <ul style="list-style-type: none"> • The Corporate Grievance Mechanisms will allow all kind of grievances to be received, and have provisions to receive anonymous grievances, be confidential, safeguards against reprisal and retaliation, and be driven by a system of logging, tracking and analyses of the grievances on a regular basis. The GM will be reviewed based on agreed Key Performance Indicators (KPIs). • IndiGrid to form a Grievance Redressal Cell and the Cell to carry out responsibilities given in the Grievance Redressal Plan and monitor implementation of asset level GRM. 	Tailored SEP and GR for Scheduled V areas. Grievance Redressal Cell Status of grievances across all assets	Project Management	Within 12 months of commitment

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
		Medium	<p>All Sites</p> <ul style="list-style-type: none"> Develop a site-specific SEP and GRM, in conjunction with the Corporate level SEP and GRM. Ensure it is contextualised to the stakeholders relevant to the project and communicate provisions under the plan with respective stakeholders through written communication. The Stakeholder Engagement planning, and design of the Grievance Mechanism will include stakeholder mapping and analysis as well as plans. The SEP will include commitment to engage with the affected people and agree on the mitigation measures including the development and implementation of an education program to sensitize communities/stakeholders about the safety risks (and environmental hazard) associated with unsafe practice of stubble burning. For Scheduled V areas, tailor the SEP and grievance mechanism to make them accessible to the tribal community in language and, design that is culturally appropriate. Asset Managers of 5 assets to undertake stakeholder mapping of all relevant stakeholders, develop plan to engage with them. The plan should include methods of engagement, purpose of engagement, periodicity etc. 	<p>Stakeholder Engagement Plan (SEP)</p> <p>Asset Level GRM</p> <p>Engagement with communities on safety risks and environmental hazards included in the SEP.</p> <p>Tailored SEP and GR for Scheduled V areas.</p>	Project Management	<p>Within 9 months of commitment</p> <p>Within 12 months of commitment</p>
			<ul style="list-style-type: none"> Develop site specific GRM and extend it to the local community in its assets. This community GM will allow all grievances to be registered including those related to their ongoing operations as well as those related to past claims and compensation related to the LA and use of the RoW. If IndiGrid is responsible for the impact, it will resolve the issue/concern and mitigate the impacts based on principles defined in PS 5. For past impacts before IndiGrid took over the asset, IndiGrid will direct the legacy grievances to the relevant government agencies (in such cases the District Administration) or to the developers of the assets who were responsible for the acquiring the ROW and constructing the assets (and were legally required to compensate the affected people) The Grievance mechanism will be provided in the IndiGrid website with appropriate details and guidance, along as well as a phone number to use to register any grievances. Affected communities/stakeholders will be made aware of the grievance mechanism (access, function, etc.) through ongoing stakeholder engagement as well as information provided at each of the site office notice boards. IndiGrid to place a suggestion/complaint register wherever security personnel are positioned across the assets and place a grievance box near substations with the name of line specified on the box. Ensure that the register and drop box is checked every month for new grievances by the Asset Manager. An asset level GRM to be developed for all 5 sites and monitored by the Grievance Redressal Cell (GRC). Regularly monitor the status of all grievances at an asset level and cumulatively at IndiGrid level. EHS and Social Manager as well as O & M contractor trained on Grievance Management 	<p>Community Grievance Mechanism in place on the IndiGrid website along with a phone number.</p> <p>Evidence of Grievance Management information provided at the site offices.</p>	Project Management	Within 9 months of commitment

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<ul style="list-style-type: none"> Track the progress of the pending as well as new litigations across the 5 assets and maintain detailed documentation of the same, including payment of compensation and other actions determined by the court or government agencies. 	Compendium of the Litigation updated regularly	Project Management	Within 6 months of commitment
6	Monitoring and Review	Medium	<ul style="list-style-type: none"> IndiGrid will prepare a detailed EHSS protocol agreed with lender to drive internal monitoring on E & S performance. This will be an annual monitoring, the findings of which will be shared with lender. Include E&S compliance review as a part of the internal EHSS monitoring and receive and implement recommendations on strengthening compliance management as well resource capacity to service the 5 assets. The EHSS monitoring should also review the implementation of the SEP and GM at each of the 5 assets IndiGrid will include labour and working condition -assessment on the SPV and O&M contractors, on compliance on regulations as well as PS2 as a part of the internal EHSS monitoring. 	<ul style="list-style-type: none"> Internal EHSS Assessment Report Internal assessment Report 	Project Management	Within 12 months of commitment
7	Protecting the Work force	Medium	<p>All Sites</p> <ul style="list-style-type: none"> It is recommended that notices of prohibition of child labour and forced labour be displayed at storerooms in such a way that they are easily visible to every worker and security personnel visiting the storeroom. The notice should be in Hindi and locally understood language. The internal labour audit protocol to include questions on different forms/practices of forced labour that can be verified during the audit quarterly across all 5 assets. 	<ul style="list-style-type: none"> Child Labour and Forced Labour Prohibition Notice, to be displayed in Hindi and local language. 	Project Management	6 months
C	IFC Performance Standard 2: Labour and Working Conditions					
1.	Policies and Procedures related to Human Resources and Workforce Protection	Medium	<p>All Sites</p> <ul style="list-style-type: none"> The Contract Agreements to incorporate clauses on all statutory compliances related to labour including normal and overtime wages, working hours, leaves, grievance redressal, prohibition of child labour and forced labour, non-discrimination, payment in bank accounts, provision of wage slips, etc. IndiGrid to form a Retrenchment Policy that guides the process of forceful termination of employees or workers by including safeguards to minimise the negative impact on them. It is recommended that notices of prohibition of child labour and forced labour be displayed at store rooms in such a way that they are easily visible to every worker and security personnel visiting the store room. The notice should be in Hindi and locally understood language. The internal labour audit protocol to include questions on different forms/practices of forced labour that can be verified during the audit quarterly across all 5 assets. Revise legatrix to include all laws applicable to the project, including but not limited to: <ul style="list-style-type: none"> - Contract Labour (Regulation & Abolition) Act, 1970; - Employees' State Insurance Act, 1948; - Employees' Provident Fund and Miscellaneous Provisions Act 1952; - Equal Remuneration Act, 1976; 	<ul style="list-style-type: none"> Revised Contract Agreement Child Labour and Forced Labour Prohibition Notice, to be displayed in Hindi and local language. Revised Internal Labour Audit Protocol Retrenchment Policy. Displayed notices at sites. 	Project Management	6 months

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<ul style="list-style-type: none"> - Maternity Benefit Act 2017; - Private Security Agencies (Regulation) Act 2005; - Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979. • Display the following at site in language understood by workers: <ul style="list-style-type: none"> - Working hours, - Leaves, - Skill-wise minimum wage rate for that quarter, • Prohibition of child labour and forced labour. 			
			IndiGrid will include labour and working condition -assessment on the SPV and O&M contractors, on compliance on regulations as well as PS2 as a part of the internal EHSS monitoring.	• Internal assessment Report	Project Management	Commence within 12 months of commitment and annually
2.	Working Conditions and Terms of Employment	Medium	<p><u>JTCL</u></p> <ul style="list-style-type: none"> • PF deductions and contributions to be made consistently for all workers engaged for the project. • Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. • Contractors to register under the Interstate Migrant Workmen Act 1979 • The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances, the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. 	<ul style="list-style-type: none"> • Principal Employer Certificate and Registration to be done under Interstate Migrant Workmen Act 1979 • Audit by Corporate HR 	Project Management	6 months
			IndiGrid will develop a Gender Strategy to increase women in the workforce for India IndiGrid Trust.	• Gender Strategy in place for India Grid Trust	HR & Project management	Within 9 months of commitment
		Medium	<p><u>MTL and RTCL</u></p> <ul style="list-style-type: none"> • Asset management to obtain Principal Employer's certificate under Inter-state Migrant Workmen Act 1979. • Contractors to register under the Interstate Migrant Workmen Act 1979 • The records submitted by the contractors need to be thoroughly checked by the Corporate HR team for such gaps and followed up. In case of repeat non-compliances the Department should take disciplinary actions and dismissal in case of repeat non-compliances despite warnings. 	<ul style="list-style-type: none"> • Principal Employer Certificate and Registration to be done under Interstate Migrant Workmen Act 1979 • Audit by Corporate HR 	Project Management	6 months
		Medium	<p><u>All Sites (Worker Accommodation)</u></p> <ul style="list-style-type: none"> • Asset Management to develop Worker Accommodation Inspection Checklists aligning with the requirements and provisions under 'Workers' Accommodation: Processes and Standards'. The provisions should include ventilation, clean drinking water, hygienic conditions of latrines and bathing rooms, waste disposal mechanisms, separation of kitchen and living facilities, among others. 	Workers Accommodation Inspection Checklist	Project Management	6 months

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<ul style="list-style-type: none"> The checklist should be executed during internal labour audits and any gaps should be included in asset level Corrective Action Plan (CAP) for monitoring. Compliance should be formed against these CAP items at the earliest. 			
3.	Grievance mechanism for workers where they can raise reasonable workplace concerns.	Medium	<p>All Sites</p> <ul style="list-style-type: none"> The asset level GRM (recommended to be developed for each of the 4 assets) needs to include dedicated mechanisms for workers' grievances. These may be in form of a grievance register placed at store rooms, drop boxes, or any other. The system should allow for, aggrieved receiving acknowledgement of grievance received, timebound resolution and escalation to asset management/regional management/corporate management etc. Once developed, the provisions should be communicated to the workers via formal meetings, which should be documented for future records. Any newly appointed contractor and workers should be made aware of this system at the time of induction. 	Revised Asset – level GRM	Project Management	6 months
4.	Occupational Health and Safety (OHS)	Low	<p>PKTCL</p> <ul style="list-style-type: none"> The existing Specific trainings pertaining to social aspects like cultural orientation to the site employees on how to deal with the community, implementation of procedures etc. to be imparted to the site employees. A feedback form should be developed and to be used to assess the effectiveness of the trainings conducted. 	Training Plans updation	Project Management	6 months
		Medium	<p>MTL</p> <p>MTL to ensure that an Environment, Safety and Health (EHS) Plan is submitted to IndiGrid by the O & M contractor.</p>	EHS Plan	Project Management	6 months
D	IFC Performance Standard 3: Resource Efficiency and Pollution Prevention					
1.	Pollution Prevention, Resource Conservation and Energy Efficiency	Medium	<p>All sites</p> <ul style="list-style-type: none"> Contract agreement with the local vender of water supply should be maintained at the site office. Diesel generator (DG) sets that are available at some assets for backup power shall be provided with proper acoustic enclosures. Emissions from DG sets are monitored through third party laboratory and noted to be compliant with host country guideline values. IndiGrid shall implement procedures to manage, handle, store and dispose all hazardous materials and wastes in designated areas with adequate secondary containment and dispose hazardous wastes through authorized entities in accordance with host country requirements. IndiGrid shall also provide adequate procedures for the management and disposal of non-hazardous waste 	Resource conservation Compliance reports	Project Management	6 months
				Evidence of proper hazardous waste management photographs and status report from each SPV, verified by EHSS monitoring		Within 6 months of commitment
E	IFC Performance Standard 4: Community Health, Safety and Security					
1	Emergency Preparedness and	Medium	<p>All Sites</p> <p>Site Specific Emergency Response Plan should be developed and should consider offsite emergencies</p>	EPRP	Project Management	6 months

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
	Response Plan (EPRP):					
2.	Electromagnetic radiation study	Medium	<p>Corporate and All Sites</p> <ul style="list-style-type: none"> o Conduct periodic assessments based on ground patrolling, for critical towers once a month and for non-critical towers once a quarter across the five assets to identify health and safety as well as community risks. o Based on the survey and if risks are identified, update the HIRA to include the risks to community exposure from transmission line operations and impacts on the community due to electrocution; electromagnetic interference and implement appropriate mitigations measures. o Engage with District Administration, Panchayats, and local community on the mitigation measures before any inspection and repair works get done. IndiGrid will also develop and implement a community awareness programme. 	<ul style="list-style-type: none"> o Periodic assessment of critical and non-critical towers through internal teams. o Updated HIRA o Records of consultations on safety and community awareness activities 	Project Management	12 months of commitment
3.	Security Management	Medium	<p>Corporate and All Sites</p> <ul style="list-style-type: none"> o Strengthen the implementation of corporate ESMS at individual assets on security management and ensure that: past records of security personnel employed are screened; security personnel have clear objectives and permissible actions laid out; security personnel are trained in avoidance of human rights abuses, identifying, and preventing gender-based violence and on protocols for interaction with community members and workers o Security Management will require that security incidents are recorded, investigated and corrective action implemented; complaints against security personnel are investigated and disciplinary actions implemented; and there is a grievance mechanism for aggrieved members of community or employees, in the event of a violation of the code for security personnel. o Regional Managers to ensure that all security personnel in their respective regions undergo the trainings identified for them in the ESMS. 	<p>Updating of the ESMS with Security Management procedure</p> <p>Training records of security personnel</p>	Project Management	12 months of commitment 18 months of commitment.
4.	Grievance Redressal Mechanism	Medium	<p>Corporate</p> <p>IndiGrid to form a Grievance Redressal Cell and the Cell to carry out responsibilities given in the Grievance Redressal Plan.</p>	Corporate Grievance Redressal Cell	Project Management	6 months
		Medium	<p>All Sites</p> <ul style="list-style-type: none"> • IndiGrid can develop and maintain a procedure for community grievance redressal mechanism and grievance register should ensure that it is communicated to the stakeholders. • IndiGrid can also document all grievances and follow up on any corrective action done. The roles and responsibilities to deal with grievances can be defined which will include management, supervisors' and workers' representatives. • Please refer to Item B, point no. 5 of this table. 	Community GRM Grievance Redressal Cell Asset Level GRM	Project Management	Within 12 months of commitment
F	IFC PS-5: Land Acquisition and Involuntary Settlement					
1.	Land Acquisition	Medium	<ul style="list-style-type: none"> • All sites • Communication between project proponent and landowners should be streamlined and documented by implementation of an effective external grievance redressal system. 	Grievance Redressal Cell Status of grievances across all assets Stakeholder Engagement Plan (SEP)	Project Management	6 months

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<ul style="list-style-type: none"> IndiGrid to ensure that minimum/no damages are caused during the maintenance and repair activities of the line and towers. Any damages caused shall be compensated at the earliest, as per the percentage of market value specified for land and at market value for crops, trees, water bodies etc. Identify the impacts on livelihood due to restriction in access or damages to crop/assets due to operations, assess the impact on the landowners/users, including an assessment of the economic loss, and implement appropriate mitigation measures, including compensation at replacement value and livelihood restoration where needed. Monitor these cases through the EHSS monitoring and ensure these are captured in the grievance mechanism records. 	Asset Level GRM		
				EHSS monitoring identifying such incidence of livelihood impacts Grievance records showing how the impacts were assessed and grievances have been addressed.	Project Management	Within 12 months of commitment
G	IFC PS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
1.	Biodiversity Impact & Risk Assessment:	Medium	<p><u>Corporate</u></p> <p>It is recommended that the Biodiversity Management approach outlined in the IndiGrid ESMS be translated into TL-specific Biodiversity Management manuals to guide Site-level biodiversity impact and risk assessment.</p> <p><u>All Sites</u></p> <p>A Biodiversity Action Plan (BAP) is to be prepared by a suitably qualified consultant(s) for each line separately that includes:</p> <ol style="list-style-type: none"> Measures to manage and monitor critical habitat values to achieve a net gain outcome for habitat of the Bengal Tiger <i>Panthera tigris ssp. Tigris</i>, IUCN EN within the Kanha - Achanakmar Tiger Corridor (Relevant for the JTCL project) Measures to manage and monitor critical habitat values to achieve a net gain outcome for habitat of the Asian Elephant <i>Elephas maximus</i> IUCN EN associated with elephant corridors transected by PKTCL and OGPTL. Consultation with the KBA secretariat/protected area manager regarding the Pocharam Wildlife Sanctuary. Additional conservation programs for the protected area/KBA are to be developed. <i>Survey for the Lesser Florican Sypheotides indicus</i> IUCN CR, within suitable habitats associated with JTCL, MTL, RTCL. The surveys are to be undertaken by a suitably qualified consultant/organisation for a minimum of two years. Once completed, a report is to be prepared outlining the results, the critical habitat status, and any recommended additional conservation actions for the species. These conservation actions are to be updated into the BAP for JTCL, MTL, RTCL. Surveys for soaring birds and waterbirds undertaken by a suitably qualified consultant/organisation for JTCL, MTL, PKTCL and RTCL. The surveys are to determine the critical habitat values (if any) for these species and recommend the design, location, installation, and maintenance requirements for bird diverter devices and anti-electrocution requirements in relevant soaring bird/water bird flyways/habitat. Measures to manage carcasses in association with community and government stakeholders is also to be defined based on the survey results. 	TL/Site-specific Biodiversity Manuals Submission of a BAP Based on discussion and agreement between lender and IndiGrid, update of the BAPs	Project Management	All surveys and studies completed within 18 months of commitment Implementation within 30 months of commitment

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<ol style="list-style-type: none"> 6. Measures to manage natural habitat values, including for: Yellow Monitor <i>Varanus flavescens</i> IUCN EN; Indian Pangolin <i>Manis crassicaudata</i> IUCN EN and Dhole <i>Cuon alpinus</i> IUCN EN 7. Measures to manage ongoing risks with the maintenance of the transmission line and corridors, including vegetation clearance, soil erosion and use of herbicides 8. A monitoring and evaluation sub-plan to track and enable adaptive management for biodiversity values within the BAP in achieving no-net-loss/net gain outcomes. 			
2.	Protection and Conservation of Biodiversity	Medium	<p>JTCL</p> <ol style="list-style-type: none"> 1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. 2. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for the subspecies <i>Panthera tigris ssp. tigris</i> (Bengal Tiger) must be instituted for the Project. 3. Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Syphoeotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species. 4. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. 5. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. 6. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivity Maps for JTCL. [See Figures J-1 & J-2] 7. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project. 8. A consultation must be conducted with the UNESCO MAB Secretariat to understand the proximity of the MAB to the Project Site & any Project-related risk to the conservation objectives 	<ol style="list-style-type: none"> 1. Report on Biodiversity Impact & Risk Assessment 2. Biodiversity Action Plan (BAP) for <i>Panthera tigris ssp. tigris</i> (Bengal Tiger) 3. Seasonal Monitoring Reports for <i>Syphoeotides indicus</i> (Lesser Florican or LF), as applicable 4. Seasonal Monitoring Reports for globally threatened soaring birds & migratory &/or congregatory water birds. 5. Adaptive Biodiversity Management Plan, as applicable 6. Report of the consultation with the MAB Secretariat 	Project Management	<p>1 year (2 years for LF monitoring)</p> <p>Report of the consultation with the MAB Secretariat : 2 months</p>
		Medium	<p>MTL</p> <ol style="list-style-type: none"> 1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly 	<ol style="list-style-type: none"> 1. Report on Biodiversity Impact & Risk Assessment 	Project Management	1 year (2 years for LF monitoring)

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<p>globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks.</p> <ol style="list-style-type: none"> Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivity Maps for MTL. [See Figures M-1 & M-2] Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/electrocution-related impacts on any species identified to be at risk from the Project. 	<ol style="list-style-type: none"> Seasonal Monitoring Reports for <i>Sypheotides indicus</i> (Lesser Florican or LF), as applicable Seasonal Monitoring Reports for globally threatened soaring birds & migratory &/or congregatory water birds. Adaptive Biodiversity Management Plan, as applicable 		
		Medium	<p>RTCL</p> <ol style="list-style-type: none"> A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. Owing to data gaps that prevent CH determination &/or informed mitigation planning for one likely CH trigger species, namely <i>Sypheotides indicus</i> (Lesser Florican or LF), minimum 2-year 3-season monitoring by an appropriate conservation organization is recommended to obtain relevant Project Site-specific data on the said species. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. The said monitoring may focus on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map for RTCL or listed in Table 1 presenting details of the inland wetlands in proximity to the Project Site. [See Figure R-1 & R-2] 	<ol style="list-style-type: none"> Report on Biodiversity Impact & Risk Assessment Seasonal Monitoring Reports for <i>Sypheotides indicus</i> (Lesser Florican or LF), as applicable Seasonal Monitoring Reports for globally threatened soaring birds & migratory &/or congregatory water birds. Adaptive Biodiversity Management Plan, as applicable 	Project Management	1 year (2 years for LF monitoring)

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/electrocution-related impacts on any species identified to be at risk from the Project.			
		Medium	<p>PKTCL</p> <ol style="list-style-type: none"> 1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. 2. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN), must be instituted for the Project. 3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. 4. The said monitoring must ideally cover at least the chief avian migratory and breeding seasons with respect to the Project Site & involve vantage point avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species. 5. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map for PKTCL. [See Figure P-1 & P-2] 6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/electrocution-related impacts on any species identified to be at risk from the Project. 	<ol style="list-style-type: none"> 1. Report on Biodiversity Impact & Risk Assessment 2. Biodiversity Action Plan (BAP) for <i>Elephas maximus</i> (Asian Elephant) 3. Seasonal Monitoring Reports for globally threatened soaring birds & migratory &/or congregatory water birds. 4. Adaptive Biodiversity Management Plan, as applicable 	Project Management	1 year
		Medium	<p>OGPTL</p> <ol style="list-style-type: none"> 1. A PS6-compliant biodiversity impact and risk assessment must be conducted for the Project, in alignment with the Biodiversity Management approach outlined in the IndiGrid ESMS, with a focus on TL-vulnerable species, mainly globally threatened soaring birds, migratory and/or congregatory water birds, to inform mitigation of biodiversity impacts & risks. 2. A Biodiversity Action Plan (BAP) designed to ensure Net Gain for <i>Elephas maximus</i> (Asian Elephant; IUCN Red List Status: EN), must be instituted for the Project. 3. Owing to data gaps that prevent informed mitigation planning for 2 TL-vulnerable avifaunal species-groups, namely soaring birds & migratory and/or congregatory water birds, monitoring is recommended to obtain relevant Project Site-specific data on the same. 4. The said monitoring would need to cover at least the chief avian migratory and breeding seasons with respect to the Project Site and involve vantage point 	<ol style="list-style-type: none"> 1. Report on Biodiversity Impact & Risk Assessment 2. Biodiversity Action Plan (BAP) for <i>Elephas maximus</i> (Asian Elephant) 3. Seasonal Monitoring Reports for globally threatened soaring birds & migratory &/or congregatory water birds. 4. Adaptive Biodiversity Management Plan, as applicable 5. Report of consultation with KBA Secretariat 	Project Management	1 year (2 months for KBA Secretariat consultation)

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
			<p>avian watches designed to identify Project-specific High Use Areas (HUAs) with respect to target species.</p> <p>5. The said monitoring may be focused on sections of the Project Site in proximity to known suitable habitats used by the target species, as marked in the Biodiversity Sensitivities Map. [See Figure O-1 & O-2]</p> <p>6. Based on the findings of the monitoring, a Project-specific adaptive management plan may be instituted for long-term management of collision/ electrocution-related impacts on any species identified to be at risk from the Project.</p> <p>7. The KBA Secretariat may be consulted to determine presence of CH within the Project Site or Project AoI with respect to the Heerakund Reservoir & Debrigarh WLS KBA+IBA</p>			
3.	Management of Ecosystem Services	Medium	<p>JTCL</p> <p>1. It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on IP communities.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p>	Ecosystem Services Management Plan designed to maintain value & functionality of the said ecosystem services, as applicable.	Project Management	1 year
		Medium	<p>MTL</p> <p>1. It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on any IP communities.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p>	Ecosystem Services Management Plan designed to maintain value & functionality of the said ecosystem services, as applicable.	Project Management	1 year
		Medium	<p>RTCL</p> <p>1. It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p>	Ecosystem Services Management Plan designed to maintain value & functionality of the said ecosystem services, as applicable.	Project Management	1 year
		Medium	<p>PKTCL</p> <p>1. It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on any IP communities.</p> <p>2. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services.</p>	Ecosystem Services Management Plan designed to maintain value & functionality of the said ecosystem services, as applicable.	Project Management	1 year

S. No	Identified Gap/Issue	Priority	Recommendation	Deliverable/Outcome	Responsibility	Timeline
		Medium	<p>OGPTL</p> <ol style="list-style-type: none"> It is recommended that priority provisioning & cultural ecosystem services being accrued by the local community from areas in and around the Project Site be documented as part of a biodiversity impact & risk assessment, with an emphasis on any IP communities. Based on the findings, a PS6-compliant management plan may be prepared & implemented to suitably mitigate any significant Project-related adverse impacts & risks with respect to the said ecosystem services. The KBA Secretariat may be consulted to determine presence of CH within the Project Site or Project AoI with respect to the Heerakund Reservoir & Debrigarh WLS KBA+IBA. 	<p>Ecosystem Services Management Plan designed to maintain value & functionality of the said ecosystem services, as applicable.</p> <p>Report of consultation with KBA Secretariat</p>	Project Management	<p>1 year</p> <p>(2 months for KBA Secretariat consultation)</p>
H	IFC PS-7: Indigenous Peoples					
1.	Indigenous Peoples	High	<p>Roll out the GRM at each asset level, and communicate its purpose and process at each Gram Panchayat where FRA and PESA have been triggered.</p>	<p>Asset level Grievance Redressal Mechanisms; and their implementation records such as registers, drop boxes, letters, calls received etc.</p>	Project Management	6 months
			<p>As part of the asset specific SEP – map and profile all IPs involved in the project and assess their expectations from the project and influence on project. Based on this plan strategies to manage positive communication with these groups throughout the project lifecycle.</p>	<p>Asset specific SEP; with dedicated engagement strategies for IPs involved in the project</p>	Project Management	6 months
			<p>Commission a Social Assessment by an independent third party to identify residual and ongoing impacts due to IndiGrid's operations on collectively/communally owned lands/assets and resources of IPs in project affected areas in general and Schedule V areas in each of the 5 transmission lines.</p>	<p>Agreed SA and SMP</p>	Project Management	Within 18 months of commitment
			<p>Develop and implement a Social Management Plan (SMP) based on outcomes of the assessment to address ongoing community level impacts. SMP to be discussed and agreed between IndiGrid, lender and the social consultant.</p>			
			<p>Undertake CSR activities focused on IPs and periodically measure outcomes through a qualitative and quantitative survey.</p>	<p>CSR Plan and Budget allocation for FY 2022-23; CSR Progress Monitoring Report for the same period.</p>	Project Management	Begin implementation in 6 months

Appendix A List of Documents Reviewed

Sr. No. Document Reviewed

JTCL	
1	Tree compensation rate list against the illegal cutting of the trees, S.No. Revenue/04/2020/3432 dated 20/07/2020
2	Labour license granted to the contractor with max number of labor employed mentioned. Licence No. CLRA/ALCJABALPUR/2021/L-270 dated: 24-dec-2021
3	100% compliance declaration by JTCL for the month of oct'21.
4	Approval of proposal for crossing of 765 Kv single circuit Jabalpur to Bina transmission line over NH12 between Jabalpur and Bina.
5	Permission for crossing of 765KV D/C Jabalpur transmission line over NH 26 NHAI/RO-MP/SAG/NOC/2013/11320 dated 27/05/2013
6	Crossing of 765 KV Jabalpur-Bina S/C Transmission line of JTCL over highway No-86 S. No. 1088// 2013-2014 dated 7-9-2013.
7	Installation of 765 KW D/C Dharamjaygarh - jabalpur Transmission line over NH-7. NHAI/RO-MP/JBP/J-58/crossing/2013/12906 dated 05/09/2013
8	Approval of proposal for crossing of 765 KV D/C Dharamjaygarh - jabalpur Transmission line over NH12-A. Letter No./10937/MPRDC/Utility/2013,Bhopal dated 09/12/2013
9	Construction of 765 KV D/C Dharamjaygarh - Jabalpur Double circuit NH-130 crossing NOC. S.No. 115//15-16 Bilaspur dated 28/5/2015.
10	Proposed 765 KV S/C transmission line crossing railway line between km 968/4 -5 between stations BHTN-BRGT in ET-JBP section, crossing railway line between km 1112/9-11 & 10-12 b/w stations PHA -ANA in BIN-KTE section. Dated 22/02/2013
11	Final approval for erection of proposed 765 Kv D/C overhead powerline crossing at KM 688/C 21 -23 & KM 688/C 22-24 between Urga and saragbunda railway stations. Ref No. EL/G/BSP/JTCL/URGA -SRBA/Final App./EIG/16/1021 dated 05/01/2016
12	Construction of 765 KV D/C Dharamjaygarh - Jabalpur transmission line approval for Railway track crossing in between Dipka-NTPC sipat. Ref No: JTCL/LITL/2014-15/372 date 19/01/2015
13	Provisional approval for erection of proposed 765 KV D/C overHead Power line crossing between Ghutku & kalmitar railway stations. Ref: EL/G/BSP/JTCL/GTK-KLTR/OH/Pro.App/14 dated 13/06/14
14	Erection permission for 765 KV D/C overhead powerline crossing of Jabalpur Transmission co. Ltd's at Km 1208/4-5 in between Bargi-Gowarighat railway station. No. EL/NGP/P-XING/509/2015/3970 dated 27/4/2015
15	Documents regarding the Approval letter from different Power line that exists within the passage were read.
16	Preventive maintenance of Transmission line annual plan template covering points like critical towers, non critical towers, trimming No.s etc.
17	IndiGrid ESMS document covering points like environmental and social policy, environment and social governance, Incident reporting format among few.
18	IndiGrid Covid guidelines with all the contacts of support staffs mentioned and the information flowchart given.
19	IndiGrid procedure for pollution control (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
20	IndiGrid procedure for waste management (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
21	Certificate of medical examination assessed during pre-employment of the employees.
22	HSE manual of IndiGrid covering PPE, HSE affairs organization, legal compliances, HSE orientation and training etc.
23	IndiGrid HSE training plan from the month of oct'21 to march'21 covering material handling, HIRA, work at height etc.
24	IndiGrid HIRA document with risks burns/skin infections/de-hydration and long term injuries with all the existing risk controls against it.
25	IndiGrid and its SPV's CSR guidance note with Key personnel committee members mentioned.
26	IndiGrid's presentation on Climate weather monitoring and prediction portal reviewed.

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27	Legatrix compliance software with statutory and internal compliance dashboard snapshots attached.
28	IndiGrid procedure for Emergency preparedness and response plan (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
29	HSE Code of conduct for contracts for working in forest, fire prevention and protection, excavation etc was reviewed.
30	Document related to vendor onboarding with details like list of documents required, vendor evaluation etc included.
31	Letter No. F/4/9/44/2014/ 10-11 /Vidyut/ 2766 dated 17 th October 2014: Stage -I clearance for the diversion of 138.31 hectares of forest land in favour of JTCL for the construction of 765 KV single circuit Jabalpur -Bina transmission line.
32	Letter No. F/4/9/44/2014/ 10-11 /Vidyut/ 671 dated 4th March 2015: Stage -II clearance for the diversion of 138.31 hectares of forest land in favour of JTCL for the construction of 765 KV single circuit Jabalpur -Bina transmission line and similar for 4 other areas.
33	JBS Enterprise pvt. Ltd. Was handed over the O & M work under rule 18(1) of the contract labour (Regulation and Abolition) central rules, 1971. Registration No. - CLRA/RLCBILASPUR/2020/R-2 dated 30/06/2020
34	Transmission licence provided for Dharamjaygarh-Jabalpur pool 765 kV, D/C Transmission line (ACSR/AAC ZEBRA). Jabalpur pool -Bina 765 kV Quad S/C transmission line (ACSR/AAAC bersemis). Licence No. 16/Transmission/2011/CERC order of the commission dated 05/09/2011 and 12/10/2011 in petition number 107/2011
35	Agreement signed between different parties and JTCL
36	Work Order with the Telegance powercomm pvt ltd was signed on a stamp paper with certificate Number IN-DL87492185240034S. The service agreement was made and entered on 1st October 2020, New Delhi. Various agreements was signed from security, right of way point of view.
37	KMZ files with transmission lines
38	Tree status if tree plantation, tree cutting and tree trimming for the month of April' 21 to Dec'21
39	Tree cutting permission letter dated 03/04/2021
40	Code of ethical business conduct covering relationships with customers, business partners and customers and interacting outside the group etc.
41	Document related to the people's organogram in IndiGrid
42	Employee policy manual with all the policies, processes and guidelines for usages mentioned
43	Minutes of the meeting held on 30/11/2021 data shared. It is mentioned that they haven't received any legal notice related to EHS or any customer complaints related to it.
44	Monthly EHS statistics data was shared for J-B and D-J line with project charging date from 30/06/2015 to 12-13/09/2015. Total Man hours worked during the months was given in the data.
45	Mock drills conducted on 5 different dates and attended by 30 people were received.
46	HSE audits checklist with points like worker screening, safety induction, PPE, training and awareness about shutdown, Emergency mock drill etc were checked
47	Awareness training program was conducted on 5 different dates was attended by 19 people.
48	Data against the EHS statistics was provided with monthly training statistics and other details like vehicle inspection, Tool PPE's, safety training etc
49	Checklist report against the unsafe Act -unsafe condition with working without taking permit, climbing tower without anchoring full harness etc mentioned
50	Creative action and prevention action register with all the nature of complaints like muffing, bushes found, worker found without wearing harness against which action was taken and hand gloves were provided. Likewise other measures were mentioned. "
51	Documents from Employee provident fund and Employee state insurance company reviewed along with the bank out passbook copy of some workers. Documents related to the wage register was also submitted.
52	Undertaking for the payment of wages (Rule 72&73) with date of wage payment as 08/11/2021
53	Compliance against the professional tax. Ref. No. JTCL/compliances/047-048 dated 19/11/2021.

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54	Compliance under inter-state migrant workmen (Regulation of Employment and condition of service) Act, 19, dated 19/11/2021.
MTL	
1	Crop compensation details with commodity name, variety name with max and min amount mentioned
2	Electrical contractor's license - Grade A valid from 21/05/2020 to 20/05/2022. License No. A/T-3939, T1-220 granted by the Government of Telangana.
3	Construction of 400kV D/C maheshwaram - mahboobnagar transmission line of MTL, powerline crossing of 765KV D/C maheshwaram -Nizamabad Ref. SR-1/Engg-TL/State-Tmsco/Clearance/282 dated:08/12/2016
4	Construction of 400KV D/C Nizamabad-Shankarpally Transmission lines of MTL, Powerline crossing of 765 D/C Ref: SR-1/Engg-TL/State-Tmsco/Clearance/300 dated: 23/01/2017
5	Installation of 400KV D/C Twin transmission lines from maheshwaram to mahboobnagar transmission lines overcrossing No. RW/HYD/Misc.-24(D)/Utility Services/1996 dated: 03/03/2017
6	Transmission line plan for inspection activities from the month of april' 21 to march'22
7	IndiGrid ESMS document covering points like environmental and social policy, environment and social governance, Incident reporting format among few.
8	IndiGridCovid guidelines with all the contacts of support staffs mentioned and the information flowchart given.
9	IndiGrid procedure for pollution control (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
10	IndiGrid procedure for waste management (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
11	Certificate of medical examination assessed during pre-employment of the employees.
12	HSE manual of IndiGrid covering PPE, HSE affairs organization, legal compliances, HSE orientation and training etc.
13	IndiGrid HIRA document with risks burns/skin infections/de-hydration and long term injuries with all the existing risk controls against it.
14	IndiGrid's presentation on Climacel weather monitoring and prediction portal reviewed.
15	Legatrix compliance software with statutory and internal compliance dashboard snap shots attached.
16	IndiGrid procedure for Emergency preparedness and response plan (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
17	HSE Code of conduct for contracts for working in forest, fire prevention and protection, excavation etc was reviewed.
18	Document related to vendor onboarding with details like list of documents required, vendor evaluation etc included.
19	F.No.4-TSC022/2016-CHN/2023 dated 14 th October - 2016: stage-I clearance for the diversion of 15.625 hectare land for the erection of 400 KV D/C Nizamabad - Yeddumailaram Transmission line at Nizamabad for the existing 400/200 KV SS of TRANSCO
20	F.No.4-TSC022/2016-CHN/0069 dated 12th January - 2018: stage-I clearance for the diversion of 15.625 hectare land for the erection of 400 KV D/C Nizamabad - Yeddumailaram Transmission line at Nizamabad for the existing 400/200 KV SS of TRANSCO
21	JBS Enterprise pvt. Ltd. was handed over the O & M work under rule 18(1) of the contract labour (Regulation and Abolition) central rules, 1971. Application No. -58/07/2015-E3/E5 dated 31/12/2020
22	Transmission licence provided for Maheshwaram - Mehboob Nagar 400 kV, D/C Transmission line 2 No. of 400 kV line bays at mehboob nagar sub-station of TSTRANSCO and Transmission licence provided for Nizamabad - Yeddumailaram (shankarpalli) 400 kV, D/C Transmission line 2 No. of 400 kV line bays at Yeddumailaram (shankarpalli) sub-station of TSTRANSCO. Licence No. 36/Transmission/2015/CERC order of the commission dated 23/10/2015 and 23/11/2015 in petition number 218/TL/2015
23	Agreement signed between different parties and MTL on 10th June 2015 .Total percentage of transmission charges payable to the provider on commissioning/COD of the element: 35% for maheshwaram mehbooba nagar 400kV D/C line. And, similarly 65% for the Nizamabad -Yeddumailaram 400kV D/C line.
24	Transmission line operations and Maintenance service agreement was signed between MTL and JBS Enterprises pvt Ltd made and entered on 8th February 2021.
25	KMZ files with transmission lines

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26	Code of ethical business conduct covering relationships with customers, business partners and customers and interacting outside the group etc.
27	Document related to the people's organogram in IndiGrid
28	Employee policy manual with all the policies, processes and guidelines for usages mentioned
29	Data against the EHS statistics was provided with monthly training statistics and other details."
30	On job training and awareness of workers conducted in the month of nov'21 with the person under whom this was imparted mentioned.
31	Concern reporting checklist for unsafe on 30/11/2021.
32	Minutes of the meeting held on 12/11/2021 data shared. It is mentioned that they haven't received any legal notice related to EHS or any customer complaints related to it
33	HSE audits checklist with points like worker screening, safety induction, PPE, training and awareness about shutdown, Emergency mock drill etc were checked
34	Monthly EHS statistics conducted on 30/11/2021 and this included the man working hours and the description of the staff members were also reported.
35	Awareness training programme was conducted on 12/11/2021 which was attended by 18 persons. Work methodology, Fire & Shut down with HIRA were the topics discussed
36	Documents from Employee provident fund and Employee state insurance company reviewed along with the bank out passbook copy of some workers. Documents related to the wage register was also submitted.
37	Undertaking for the payment of wages (Rule 72&73) with date of wage payment as 08/11/2021
38	Compliance against the professional tax with challan no. 6102675728 for the month of october'21.
39	Compliance under inter-state migrant workmen (Regulation of Employment and condition of service) Act, 1979. Ref. No. JBS/HR/21-22/2111699 dated 30/11/2021.

PKTCL

1	Rate of standing chart based on the rates collected from DFO, Ranchi for the year 1995-1996 with name of the tree, girth (in meters), rates wef from 1995-96 and 2015-16 and rates after 30% reduction.
2	Directorate of the forest schedules of rates
3	Labor license granted to the contractor with max number of contract labor to be employed on a single day mentioned. License No. CLRA/ALCKOLKATA2/2021/L-209 dated 20/09/2021
4	Permission granted for the overhead powerline crossing proposal of NH-6, Kharagpur to Behragora Ref: NHA/PIU/PD/JSR/camp Ranchi/171 dated 05/11/2015
5	Permission for stringing of 400kV D/C overhead powerline crossing in between haludpukur-bahalda railway station Letter No. CKPD.229/HLD-BDO/400KV-PKTCL dated: 17/02/2016
6	Permission granted over the submission of over head powerline crossing proposal of NH-33, Ranchi Tata for 400 KV D/C Ref. NHA/PIU/PD/RNC/NH-33/NOC/1375 dated 9/12/2015
7	Approval of proposed PKTCL's 400KV D/C over electrified track between SUIISA -TORANG station Ref: PKTCL/SGL/F-21/D-358 dated 18/04/2016
8	Approval of proposed PKTCL's 400KV D/C PKTCL over electrified track between Lodhma -Balsairang stations at KM 437/11 - 437/12 in HTE-NXN section Ref: PKTCL/SGL/F-21/D-358 dated 18/04/2016
9	Documents regarding the Approval letter from different national highways that exists within the passage were read.
10	Documents regarding the Approval letter from different Power line that exists within the passage were read.
11	Documents regarding the Approval letter from different Railway lines that exists within the passage were read.
12	IndiGrid ESMS document covering points like environmental and social policy, environment and social governance, Incident reporting format among few.
13	IndiGrid Covid guidelines with all the contacts of support staffs mentioned and the information flowchart given.
14	IndiGrid procedure for pollution control (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
15	IndiGrid procedure for waste management (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
16	Certificate of medical examination assessed during pre-employment of the employees.
17	HSE manual of IndiGrid covering PPE, HSE affairs organization, legal compliances, HSE orientation and training etc.

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18	IndiGrid HIRA document with risks burns/skin infections/de-hydration and long term injuries with all the existing risk controls against it.
19	IndiGrid's presentation on Climacel weather monitoring and prediction portal reviewed.
20	Legatrix compliance software with statutory and internal compliance dashboard snap shots attached.
21	IndiGrid procedure for Emergency preparedness and response plan (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
22	HSE Code of conduct for contracts for working in forest, fire prevention and protection, excavation etc was reviewed.
23	Document related to vendor onboarding with details like list of documents required, vendor evaluation etc included.
24	Permission for trimming of trees coming under induction zone of 400KV D/C kharagpur-chaibasa line. Ref No. 928/13/-55(Trim)/PKTCL/2020, dated 27th may 2020.
25	Labor licence granted to the contractor with the max number of contract labors to be employed on a single day as 27. Licence no. CLRA/ALCKOLKATA2/2021/L -209 dated 20/09/2021.
26	No. 5-WBC093/2016-BHU dated 28th September, 2018: Stage -II clearance for the diversion of 12.288 ha of forest land in favour of Purulia - Kharagpur transmission company ltd for the construction of purulia - ranchi 400KV/DC transmission line
27	No.FP/JH/TRANS/14842/2014/4598 dated 22nd September, 2021: Stage -II clearance for the diversion of 59.501 ha of forest land in favour of Purulia - Kharagpur transmission company ltd for the construction of purulia - ranchi 400KV/DC transmission line in Khunti and ranchi districts of Jharkhand region and similar for 2 other areas
28	Sterlite Powergrid Ventures Ltd. Was handed over the operation and maintenance work under rule 18(1) of the contract labour (Regulation and Abolition) central rules, 1971. Registration No. - R-01/2015-RLC dated 15/1/2015
29	Transmission licence provided for Purulia PSP (WB) -Ranchi (PG) 400 kV, D/C Transmission line and Transmission licence provided for Kharagpur (WBSETCL) -Chaibasa (PG) 400 kV, D/C Transmission line. Schedule date of commissioning: 28 Months from the effective date. Licence No. 25/Transmission/2014/CERC order of the commission dated 30/4/2014 and 30/5/2014 in petition number 326/TL/2013
30	The Transmission line agreement between the parties was made on 6th August 2013. Scheduled COD for the overall project: 28 Months from the effective date
31	Work order for the maintenance work of 400kV D/C Ranchi - Purulia Transmission Line (110Km) was signed on 25th January 2017 with JBS enterprise Pvt Ltd
32	KMZ files with transmission lines
33	Code of ethical business conduct covering relationships with customers, business partners and customers and interacting outside the group etc.
34	Document related to the people's organogram in IndiGrid
35	Employee policy manual with all the policies, processes and guidelines for usages mentioned
36	Compliance against the professional tax for the month of oct'2021 at purulia ranchi line. Ref. No. JBS/HR/21 - 22/2111704 dated 30/11/2021.
37	Compliance under inter-state migrant workmen (Regulation of Employment and condition of service) Act, 1979. Ref. No. JBS/HR/21-22/2111703 dated 30/11/2021.
38	Undertaking for the payment of wages (Rule 72&73) with date of wage payment as 08/11/2021
39	Documents from Employee provident fund and Employee state insurance company reviewed along with the bank out passbook copy of some workers. Documents related to the wage register was also submitted.

RTCL

1	Preventive maintenance of Transmission line annual plan template covering points like critical towers, non-critical towers, trimming No.s etc.
2	IndiGrid ESMS document covering points like environmental and social policy, environment and social governance, Incident reporting format among few.
3	IndiGrid Covid guidelines with all the contacts of support staffs mentioned and the information flowchart given.
4	IndiGrid procedure for pollution control (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
5	IndiGrid procedure for waste management (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)

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6	Certificate of medical examination assessed during pre-employment of the employees.
7	HSE manual of IndiGrid covering PPE, HSE affairs organization, legal compliances, HSE orientation and training etc.
8	IndiGrid HSE training plan from the month of oct'21 to march'21 covering material handling, HIRA, work at height etc.
9	IndiGrid HIRA document with risks burns/skin infections/de-hydration and long term injuries with all the existing risk controls against it.
10	IndiGrid and its SPV's CSR guidance note with Key personnel committee members mentioned.
11	IndiGrid's presentation on Climacel weather monitoring and prediction portal reviewed.
12	Legatrix compliance software with statutory and internal compliance dashboard snap shots attached.
13	IndiGrid procedure for Emergency preparedness and response plan (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
14	HSE Code of conduct for contracts for working in forest, fire prevention and protection, excavation etc was reviewed.
15	Document related to vendor onboarding with details like list of documents required, vendor evaluation etc included.
16	KMZ files with Transmission Lines, Substations;
17	Tower Schedule of Transmission Lines (RAPP - Shujalpur)
18	Transmission Services Agreement between RTCL and Long Term Consumers for Procurement of Transmission Services
19	Transmission Licence from CERC, Ref No. 67/TL/2014 for establishment and operation of RTCL
20	Transmission Line Maintenance Service Agreement between RTCL and Yashmun Engineers Limited, dated 20 May 2016

OGPTL

1	Labour license granted to the contractor with max number of labor to be employed on a single day as 30. Licence No. CLRA/RLCBILASPUR/2021/L-77 dated: 17-March-2021
2	100% compliance declaration by OGPTL for the month of oct'21.
3	Approval of power line crossing of 765 kV Sundargargh – Raipur D/C transmission line of OGPTL over NH-49 in between milestone no. 138-139 near Dushkela at village Madanpur of Tehsil Kharsia in District Raigargh.
4	Approval of power line crossing of 765 kV Sundargargh – Raipur D/C transmission line of OGPTL over NH-49 in between mile stone no. 138-139 near Dushkela at village Madanpur of Tehsil Kharsia in District Raigargh.
5	Crossing of 765 KV Jabalpur-Bina S/C Transmission line of JTCL over highway No-86 S. No. 1088// 2013-2014 dated 7-9-2013.
6	Approval for EHV power line overhead crossing of 765 kV D/C Sundargargh -Raipur TL of OGPTL with existing 400 kV S/C Khedamara – Raita (Raipur) line of CSPTCL. Ref.No. ED/EHT: C&M/Works/ 1870, dated 05.10.2016;
7	Approval of 765 kv Overhead power line crossing of OGPTL in between Hathbandh and Bhatapara stations. No. EL/G/R/765 kv-oh x-ING/ Odisha Gen/ HN-BYT/16/02/1615, dated 11.12.2017;
8	Approval of 765kv overhead power line crossing of OGPTL in between Bhatapara Railway station and Ambuja cement plant. No. EL/G/R/765 kv-oh x-ING/ Odisha Gen/ BYT-Ambuja /2016/04, dated 11.12.2017;
9	No Inter-state migrant workers included. Doc: JBS/HR/ 21-22/ 211698, dated 30.11.2021.
10	Preventive maintenance of Transmission line annual plan template covering points like critical towers, non critical towers, trimming No.s etc.
11	IndiGrid ESMS document covering points like environmental and social policy, environment and social governance, Incident reporting format among few.
12	IndiGrid Covid guidelines with all the contacts of support staffs mentioned and the information flowchart given.
13	IndiGrid procedure for pollution control (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
14	IndiGrid procedure for waste management (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
15	HSE manual of IndiGrid covering PPE, HSE affairs organization, legal compliances, HSE orientation and training etc.

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16	IndiGrid HIRA document with risks burns/skin infections/de-hydration and long term injuries with all the existing risk controls against it.
17	IndiGrid and its SPV's CSR guidance note with Key personnel committee members mentioned.
18	IndiGrid's presentation on Climacel weather monitoring and prediction portal reviewed.
19	Legatrix compliance software with statutory and internal compliance dashboard snap shots attached.
20	IndiGrid procedure for Emergency preparedness and response plan (ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)
21	HSE Code of conduct for contracts for working in forest, fire prevention and protection, excavation etc was reviewed.
22	Letter FC-III/CH-21/2017-NGP/2756, dated 17.10.2017, for diversion of 71.761 ha of forest land for construction of 765 D/C Transmission Line in Jharsuguda (Sundergarh – Raipur Pooling Station)
23	letter- No. 5-ORA334/2018-BHU, dated 06.03.2018, for diversion of 20.8ha of Jamkhani Reserved Forest, 16.08ha of Demarcated Protected Forest, 3.67ha DLC Land and 54.08 ha of Revenue forest; for construction of 765 kV D/C Transmission line in Sundergarh, Odisha to Raipur Pool.
24	Transmission licence issued to OGPTL for establishment of inter-state Transmission System – Licence No. 42/Transmission /2016/CERC dated 30.06.2016. Jharsuguda (Sundargarh) – Raipur Pool 765 kV D/C line (Hexa Zebra Conductor). OPGC – Jharsuguda (Sundargarh) 400 kV D/C (Triple Snowbird Conductor).
25	Mock drills conducted on different dates and attended by employees were reviewed.
26	HSE audits checklist with points like worker screening, safety induction, PPE, training and awareness about shutdown, Emergency mock drill etc were checked
27	Awareness training program was conducted on 5 different dates was attended by 19 people.

Appendix B Key Reference for Ecological Assessments

JTCL

- Jhala, Y. V, Qureshi, Q. & Nayak, A. K. (eds). 2019. Status of tigers, co-predators and prey in India 2018. Summary Report. National Tiger Conservation Authority, Government of India, New Delhi & Wildlife Institute of India, Dehradun. TR No./2019/05.
- Q. Qureshi, S, Saini, P. Basu, R. Gopal, R. Raza, Y. Jhala, 2014. Connecting Tiger Populations for Long-term Conservation. National Tiger Conservation Authority & Wildlife Institute of India, Dehradun. TR2014-02
- https://wii.gov.in/images/images/documents/connecting_tiger.pdf
- <https://pib.gov.in/Pressreleaseshare.aspx?PRID=1594508>
- <https://ntca.gov.in/corridor-management/#corridor-management>
- BirdLife International. 2021. *Gyps indicus*. *The IUCN Red List of Threatened Species 2021*: e.T22729731A204672586. <https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22729731A204672586.en>. Accessed on 14 February 2022.

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- Vyas, Rakesh & Singh, Himmat. (2004). Biodiversity survey of Gandhisagar Reservoir, Madhya Pradesh. Zoos' Print Journal. 19. 1525-1529. 10.11609/JoTT.ZPJ.950.1525-9.
- Key Biodiversity Areas Partnership (2022) Key Biodiversity Areas factsheet: Gandhi Sagar Wildlife Sanctuary and reservoir. Extracted from the World Database of Key Biodiversity Areas. Developed by the Key Biodiversity Areas Partnership: BirdLife International, IUCN, American Bird Conservancy, Amphibian Survival Alliance, Conservation International, Critical Ecosystem Partnership Fund, Global Environment Facility, Global Wildlife Conservation, NatureServe, Rainforest Trust, Royal Society for the Protection of Birds, World Wildlife Fund and Wildlife Conservation Society. Downloaded from <http://www.keybiodiversityareas.org/> on 18/01/2022.
- BirdLife International (2022) Important Bird Areas factsheet: Gandhi Sagar Wildlife Sanctuary and reservoir. Downloaded from <http://www.birdlife.org> on 18/01/2022.
- Key Biodiversity Areas Partnership (2022) Key Biodiversity Areas factsheet: Jawahar Sagar Sanctuary. Extracted from the World Database of Key Biodiversity Areas. Developed by the Key Biodiversity Areas Partnership: BirdLife International, IUCN, American Bird Conservancy, Amphibian Survival Alliance, Conservation International, Critical Ecosystem Partnership Fund, Global Environment Facility, Global Wildlife Conservation, NatureServe, Rainforest Trust, Royal Society for the Protection of Birds, World Wildlife Fund and Wildlife Conservation Society. Downloaded from <http://www.keybiodiversityareas.org/> on 18/01/2022.
- BirdLife International (2022) Important Bird Areas factsheet: Jawahar Sagar Sanctuary. Downloaded from <http://www.birdlife.org> on 18/01/2022.
- Key Biodiversity Areas Partnership (2022) Key Biodiversity Areas factsheet: Alniya Dam. Extracted from the World Database of Key Biodiversity Areas. Developed by the Key Biodiversity Areas Partnership: BirdLife International, IUCN, American Bird Conservancy, Amphibian Survival Alliance, Conservation International, Critical Ecosystem Partnership Fund, Global Environment Facility, Global Wildlife Conservation, NatureServe, Rainforest Trust, Royal Society for the Protection of Birds, World Wildlife Fund and Wildlife Conservation Society. Downloaded from <http://www.keybiodiversityareas.org/> on 18/01/2022.
- <http://datazone.birdlife.org/site/factsheet/18345>
- BirdLife International (2022) Important Bird Areas factsheet: Alniya Dam. Downloaded from <http://www.birdlife.org> on 18/01/2022.

PKCTL

- Williams, C., Tiwari, S.K., Goswami, V.R., de Silva, S., Kumar, A., Baskaran, N., Yoganand, K. & Menon, V. 2020. *Elephas maximus*. *The IUCN Red List of Threatened Species 2020*: e.T7140A45818198. <https://dx.doi.org/10.2305/IUCN.UK.2020-3.RLTS.T7140A45818198.en>. Accessed on 13 February 2022.
- Menon, V. & Tiwari, Sandeep. (2019). Population status of Asian elephants *Elephas maximus* and key threats. *International Zoo Yearbook*. 53. 10.1111/izy.12247.

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MTL

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OGPTL

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Appendix C Photo-documentation

JTCL


Site Location: JTCL	
Photo No. 1	Date: 01.02.2022
Description: Transmission Tower in Natural Habitat (Forest)	
	


Site Location: JTCL	
Photo No. 2	Date: 01.02.2022
Description: Transmission Line passing through Natural Habitat (Forest)	
	

Site Location: JTCL	
Photo No. 3	Date: 01.02.2022
Description: Local community fishing in a natural stream near forest, a provisioning ecosystem service.	
	


Site Location: JTCL	
Photo No. 4	Date: 01.02.2022
Description: Transmission tower in modified habitat (arable land)	
	

MTL


Site Location: MTL	
Photo No. No.1	Date: 01.02.2022
Description: Modified Habitat (cropped Arable Land) near Project Site	
	


Site Location: MTL	
Photo No.2	Date: 01.02.2022
Description: Water bird habitat of Pocharam Reservoir in Pocharam Wildlife Sanctuary KBA+IBA near Project Site	
	


Site Location: MTL	
Photo No.3	Date: 01.02.2022
Description: Modified habitat (cropped Arable Land) in & around Project Site	
	

Site Location: MTL	
Photo No.4	Date: 02.02.2022
Description: Modified habitat (fallow Arable Land) in & around Project Site	
	


PKTCL


Site Location: PKTCL	
Photo No. 1	Date: 05.02.2022
Description: Transmission Line over Natural Habitat (inland wetland), with transmission tower in Forest	
	


Site Location: PKTCL	
Photo No. 2	Date: 05.02.2022
Description: Transmission Line passing through Modified Habitat (Arable Land)	
	

Site Location: PKTCL	
Photo No. 3	Date: 05.02.2022
Description: Dumriya Hill Forest, an Elephant Corridor	
	


RTCL


Site Location: RTCL	
Photo No. 1	Date: 01.02.2022
Description: Legally Protected Area overlapped by Project Site	
	


Site Location: RTCL	
Photo No. 2	Date: 01.02.2022
Description: Soaring bird foraging habitat in & around Project Site	
	


Site Location: RTCL	
Photo No. 3	Date: 01.02.2022
Description: Soaring bird roosting & foraging habitats around ridge near Project Site	
	

Site Location: RTCL	
Photo No. 4	Date: 01.02.2022
Description: Water bird habitat of Gandhi Sagar WLS & Reservoir KBA+IBA near Project Site	
	


Site Location: RTCL	
Photo No. 5	Date: 01.02.2022
Description: Seasonal stream near Project Site	
	


Site Location: RTCL	
Photo No. 6	Date: 01.02.2022
Description: Seasonal lake near Project Site	
	


Site Location: RTCL	
Photo No. 7	Date: 01.02.2022
Description: Fallow arable lands in & around Project Site	
	

Site Location: RTCL	
Photo No. 8	Date: 01.02.2022
Description: Cropped arable lands in & around Project Site	
	


Site Location: RTCL		
Photo No. 9	Date: 01.02.2022	
Description: Water storage area of Rewa Dam near Project Site		


Site Location: RTCL		
Photo No. 10	Date: 01.02.2022	
Description: Water bird flocks in water storage area of Rewa Dam near Project Site		

Site Location: RTCL		
Photo No. 11	Date: 01.02.2022	
Description: Water bird habitat in & around Project Site		

Site Location: RTCL	
Photo No. 12	Date: 01.02.2022
Description: Perennial Pond near Project Site	
	

Site Location: RTCL	
Photo No. 13	Date: 01.02.2022
Description: Seasonal lake near Project Site	
	

Site Location: RTCL	
Photo No. 14	Date: 01.02.2022
Description: Waterlogged excavation near Project Site	
	

Site Location: OGPTL	
Photo No. 15	Date: 22.03.2022
Description: Tower passing through natural habitat	
	

Site Location: OGPTL	
Photo No. 16	Date: 22.03.2022
Description: View of Hirakund Reservoir from Jawahar watch tower	
	

Site Location: OGPTL	
Photo No. 17	Date: 22.03.2022
Description: View of Hirakund backwaters near towers 49/0 to 49/4	
	

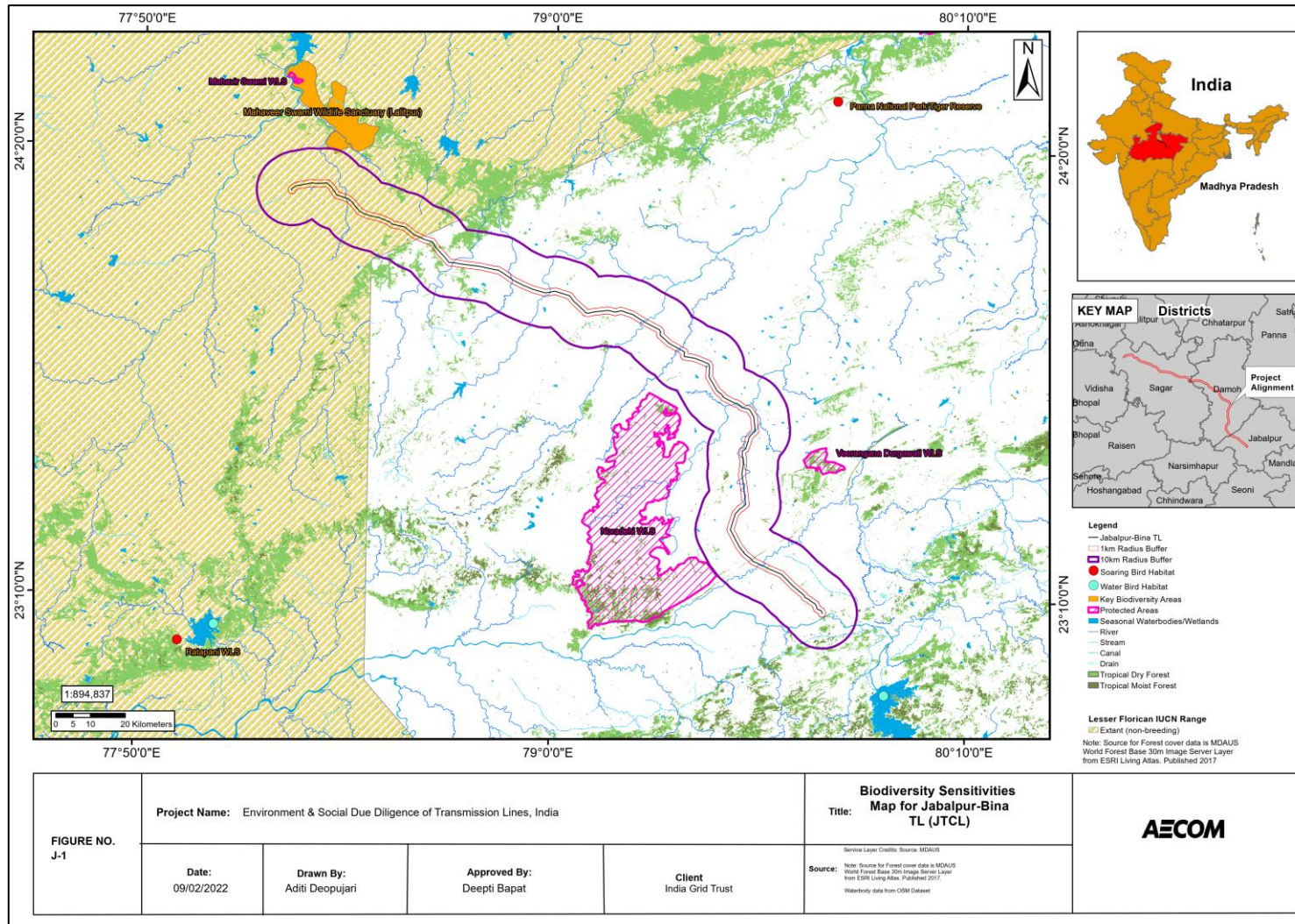
Site Location: OGPTL	
Photo No. 18	Date: 22.03.2022
Description: Interaction with local stakeholder	

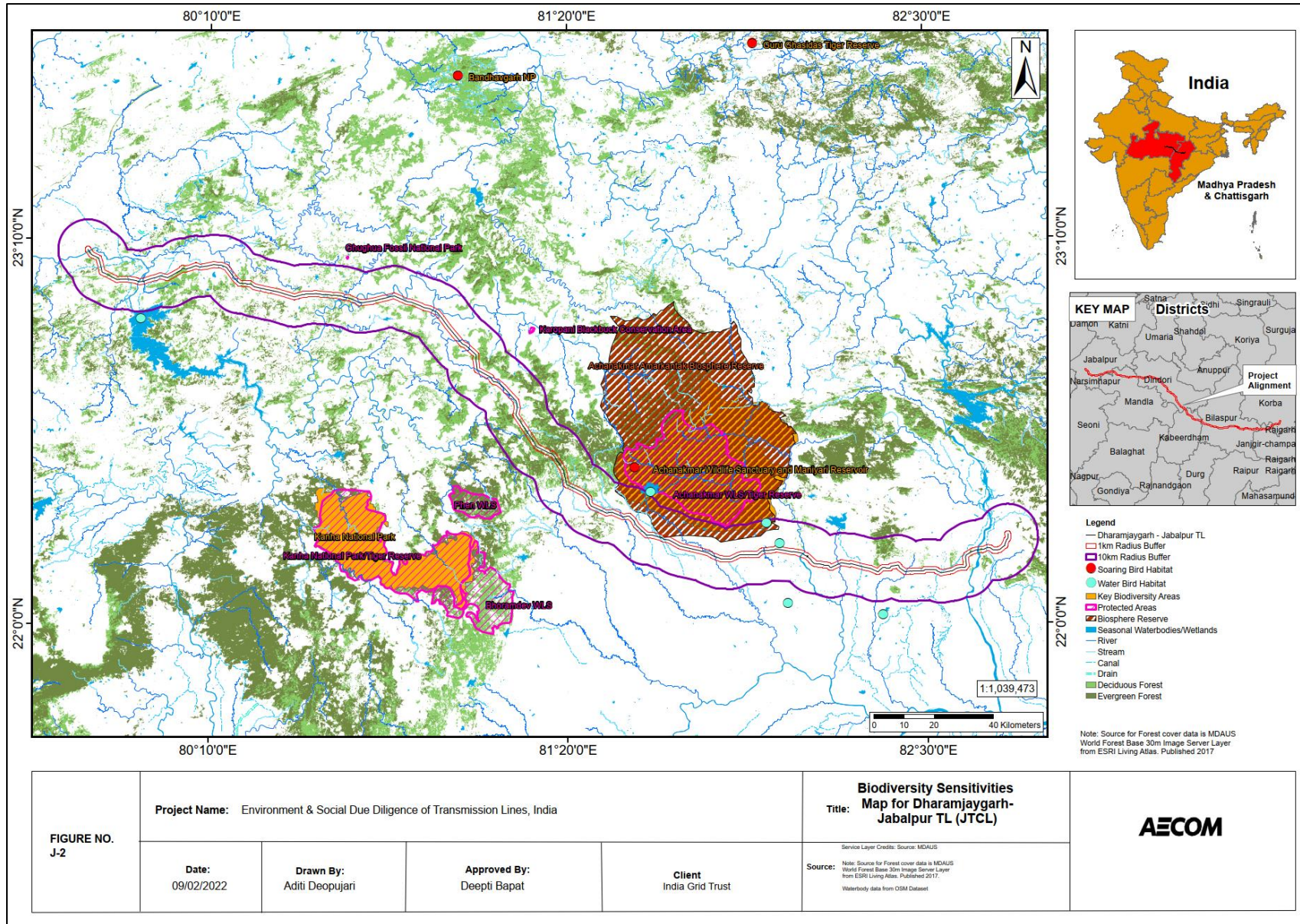
Appendix D Potential Water Bird Habitats in or near the Project Site

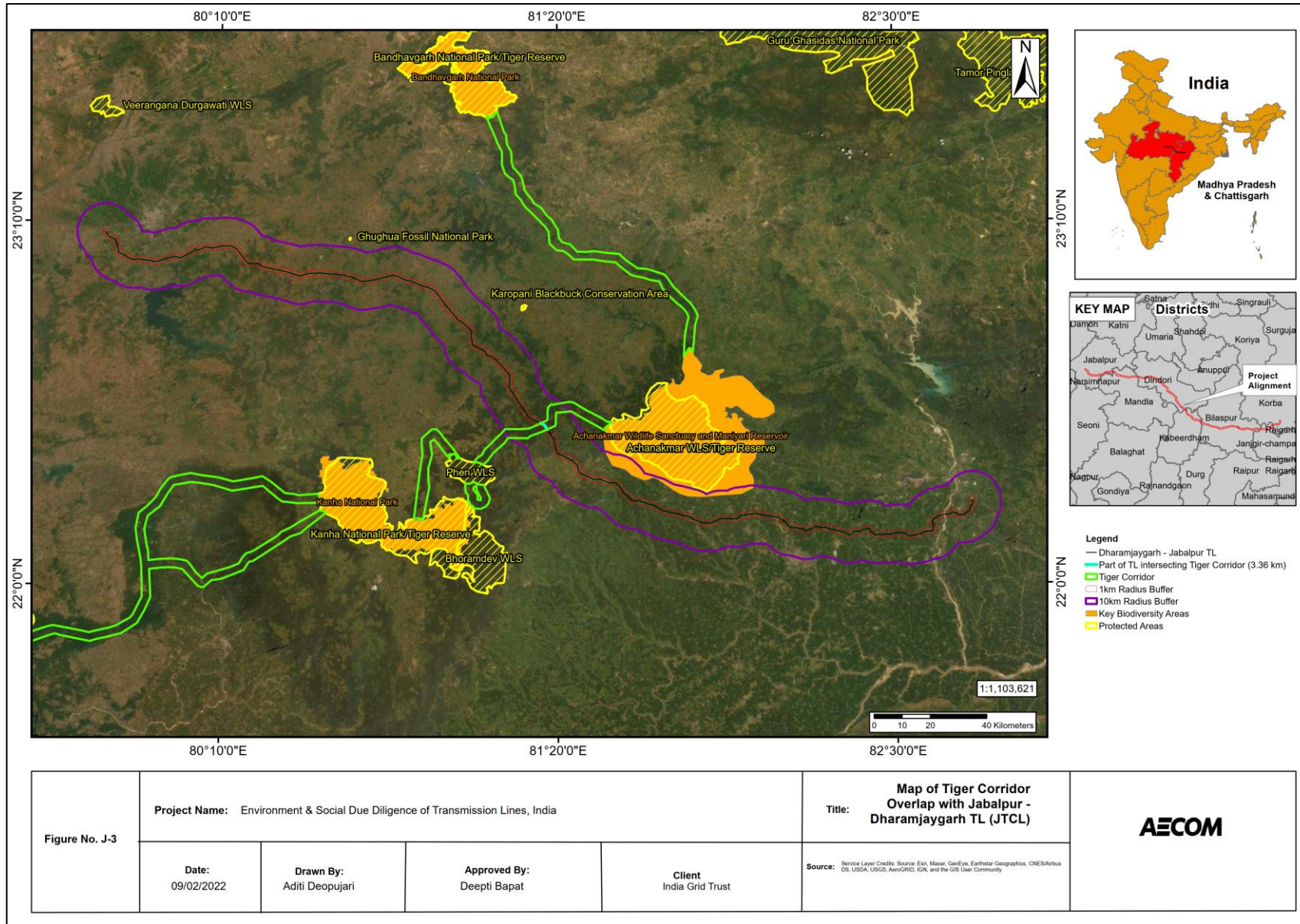
S. N.	Location Code	Location Co-ordinates	Habitat Type*	Nearest TL Tower	Distance & Direction from nearest TL Tower
1	W1	24° 43.843'N, 75° 49.935' E	Water Storage Area (Gandhi Sagar)	7/15	500m, E
2	W2	24° 28.964' N, 76° 00.415' E	River	17/8 -18/1	0m
3	W3	24° 48.438' N, 75° 45.274' E	Seasonal Lake	5/20	55m, W
4	W4	24° 48.643' N, 75° 45.673' E	Perennial Lake	5/20	885m, W
5	W5	24° 48.074' N, 75° 46.130' E	Seasonal Lake	5/24	715m, W
6	W6	24° 47.379' N, 75° 46.630' E	Seasonal Lake	AP-6 -6/2	0m
7	W7	24° 47.067' N, 75° 48.243' E	Seasonal Lake	6/10	550m, S
8	W8	24° 46.104' N, 75° 49.162' E	Pond (Reenchi Check Dam)	7/1-7/4	0m
9	W9	24° 44.896' N, 75° 50.570' E	Seasonal Lake	7/12,	341m, SW
10	W10	24° 42.561' N, 75° 53.133' E	River	9/10 -9/14	0m
11	W11	24° 41.968' N, 75° 53.165' E	Pond (Takali Dam)	9/13	754m, NE
12	W12	24° 39.276' N, 75° 54.941' E	Seasonal Lake	11/8	578m, W
13	W13	24° 37.647' N, 75° 54.897' E	Seasonal Lake	12/1	488m, W
14	W14	24° 36.960' N, 75° 55.021' E	Seasonal Lake	12/4-12/6	0m
15	W15	24° 34.991' N, 75° 56.399' E	Seasonal Lake	14/2-14/3	0m
16	W16	24° 32.108' N, 75° 57.588' E	Water Storage Area (Rewa Dam)	16/6	995m, E
17	W17	24° 29.828' N, 75° 59.928' E	Seasonal Lake	17/6-17/7	0m
18	W18	24° 24.004' N, 76° 03.398' E	Pond (Bhanya Khedi Dam)	22A/1	606m, N
19	W19	24° 15.670' N, 24° 15.670' N	Seasonal Lake	26/11-AP27/0	0m
20	W20	24° 05.362' N, 76° 17.747' E	Pond (Mohli Check Dam)	32/4-32/8	0m
21	W21	23° 49.222' N, 76° 27.645' E	Seasonal Lake	41/0-41/2	0m
22	W22	23° 32.893' N, 76° 39.887' E	Perennial Lake (Tikod)	48/20	286m, W

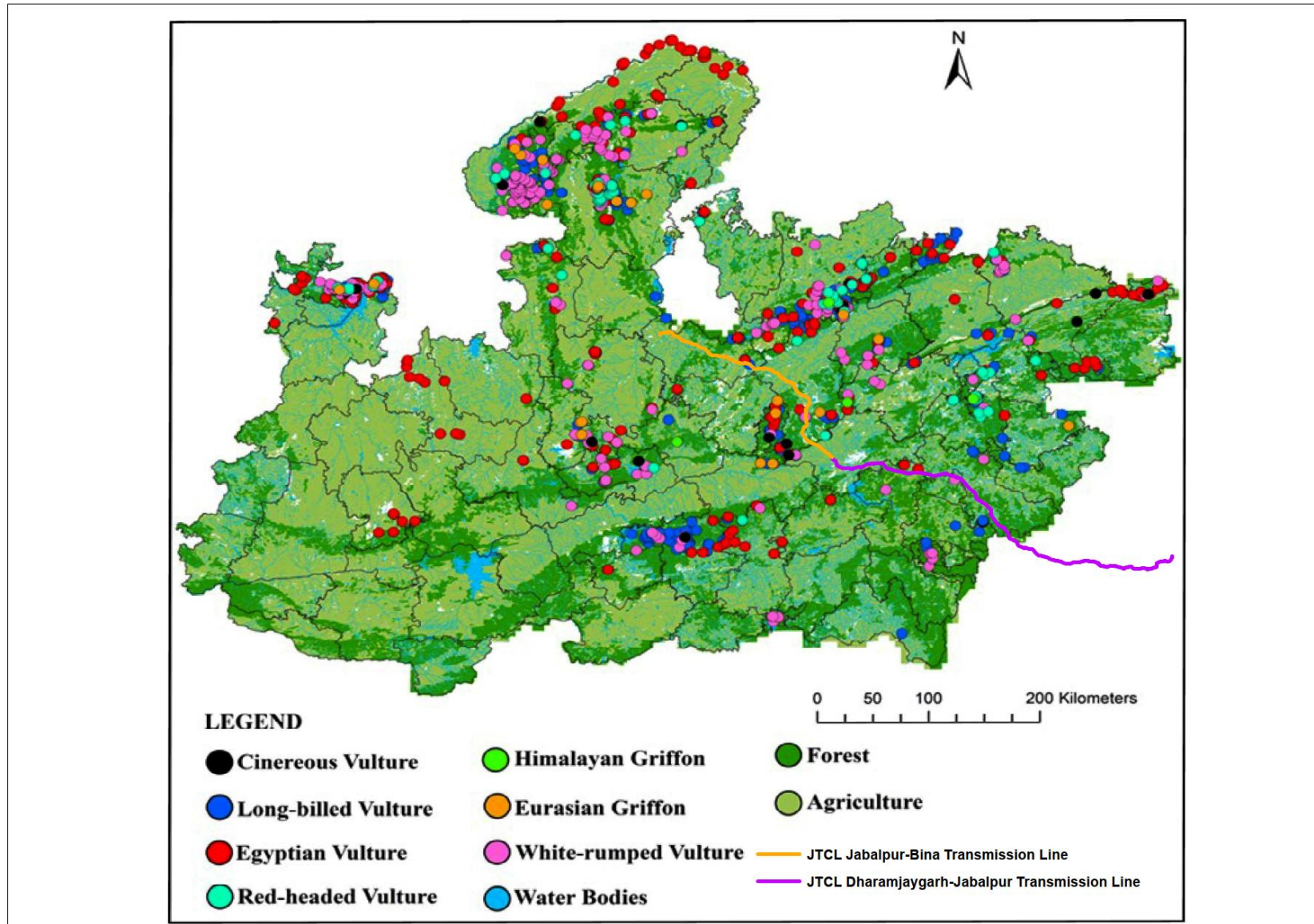
*as per IUCN Habitat Classification

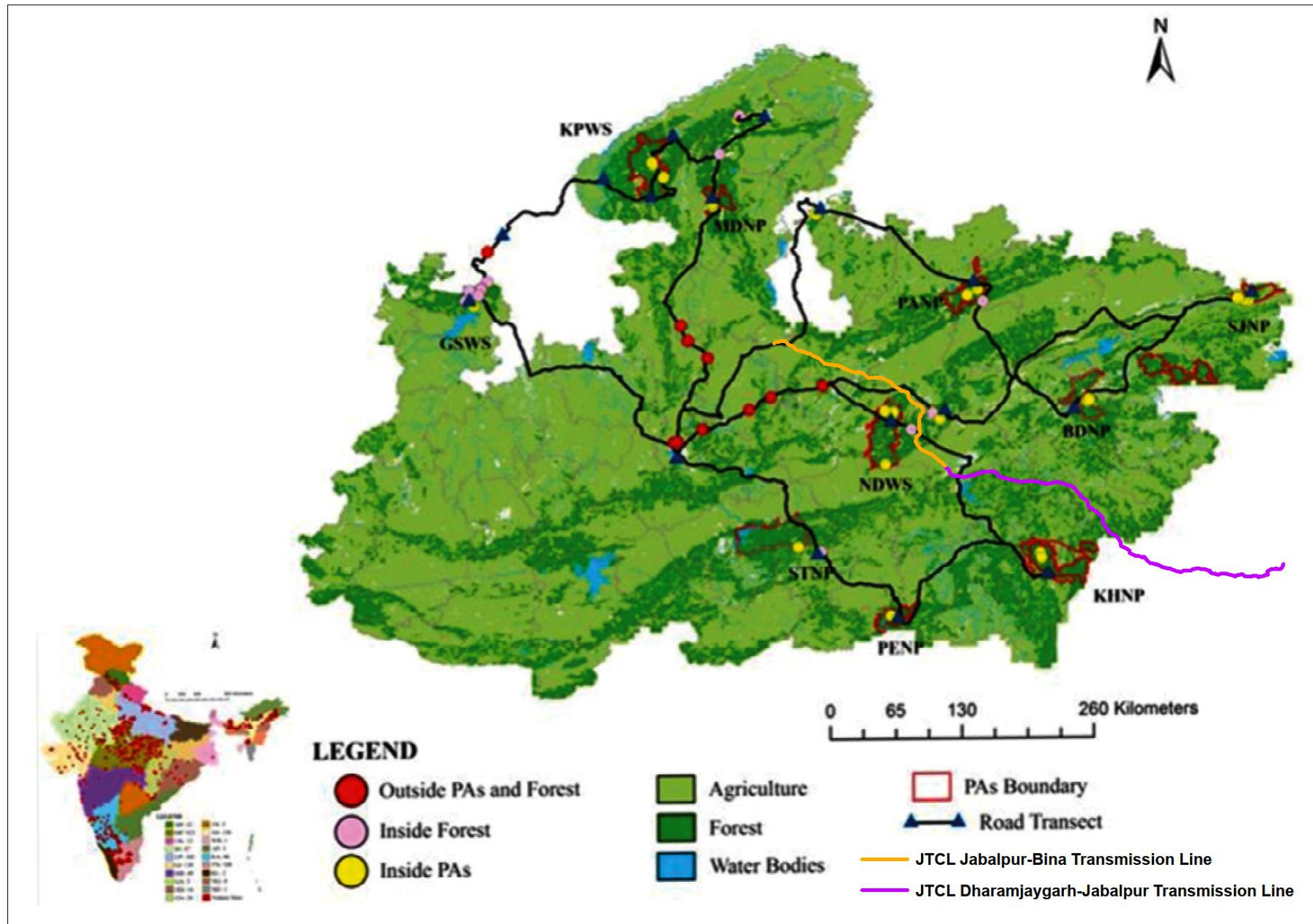
Appendix E Biodiversity Maps

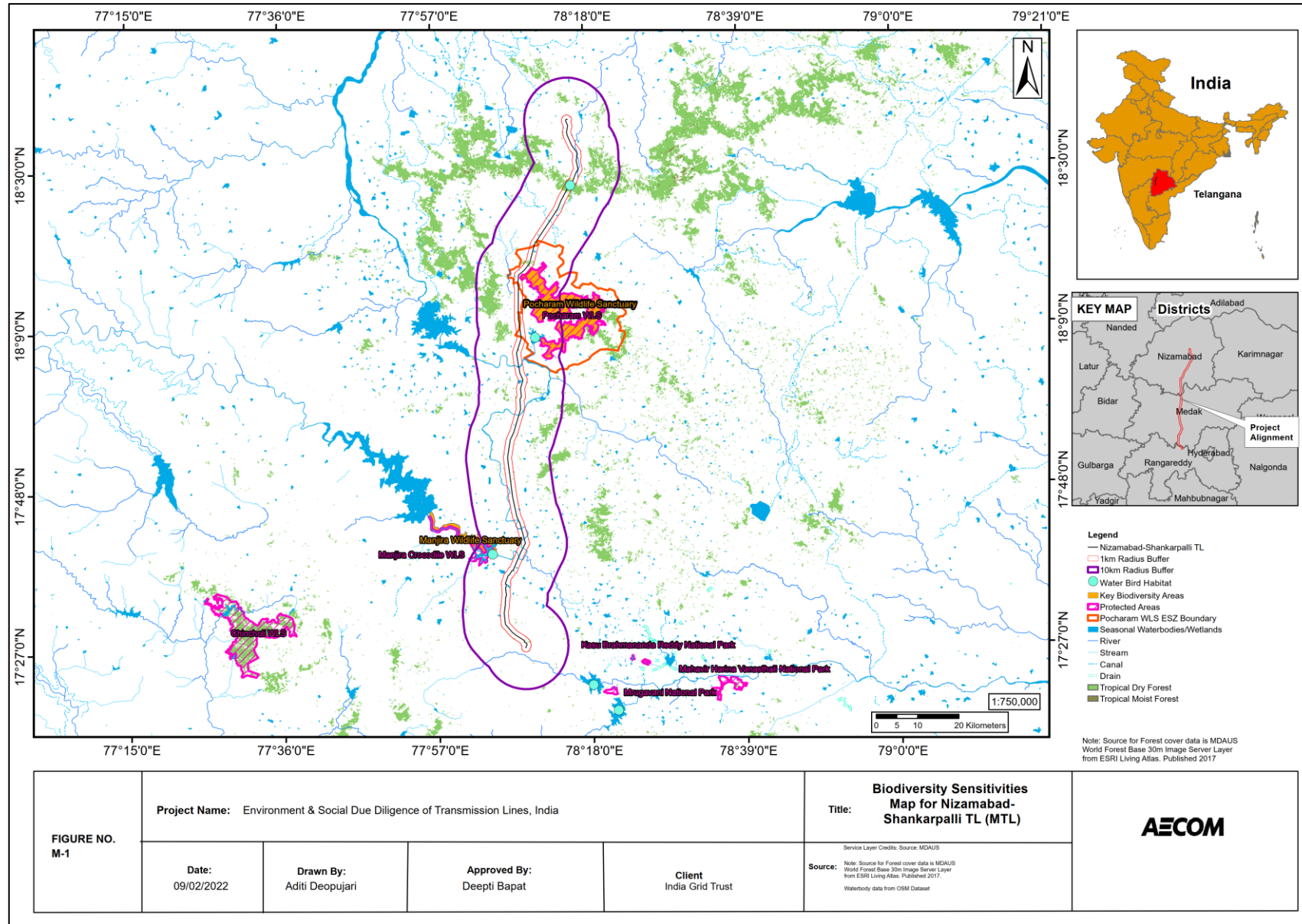


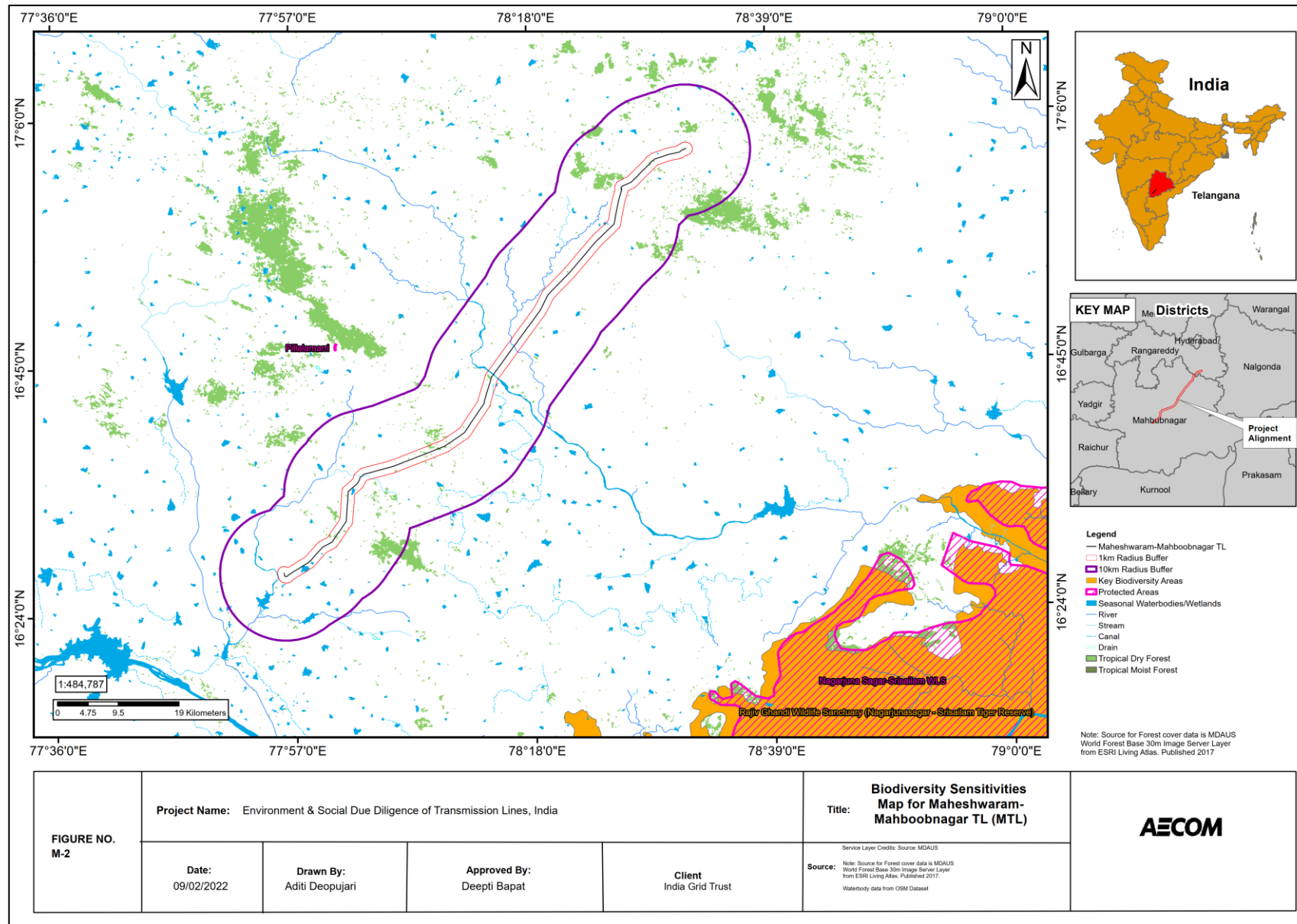


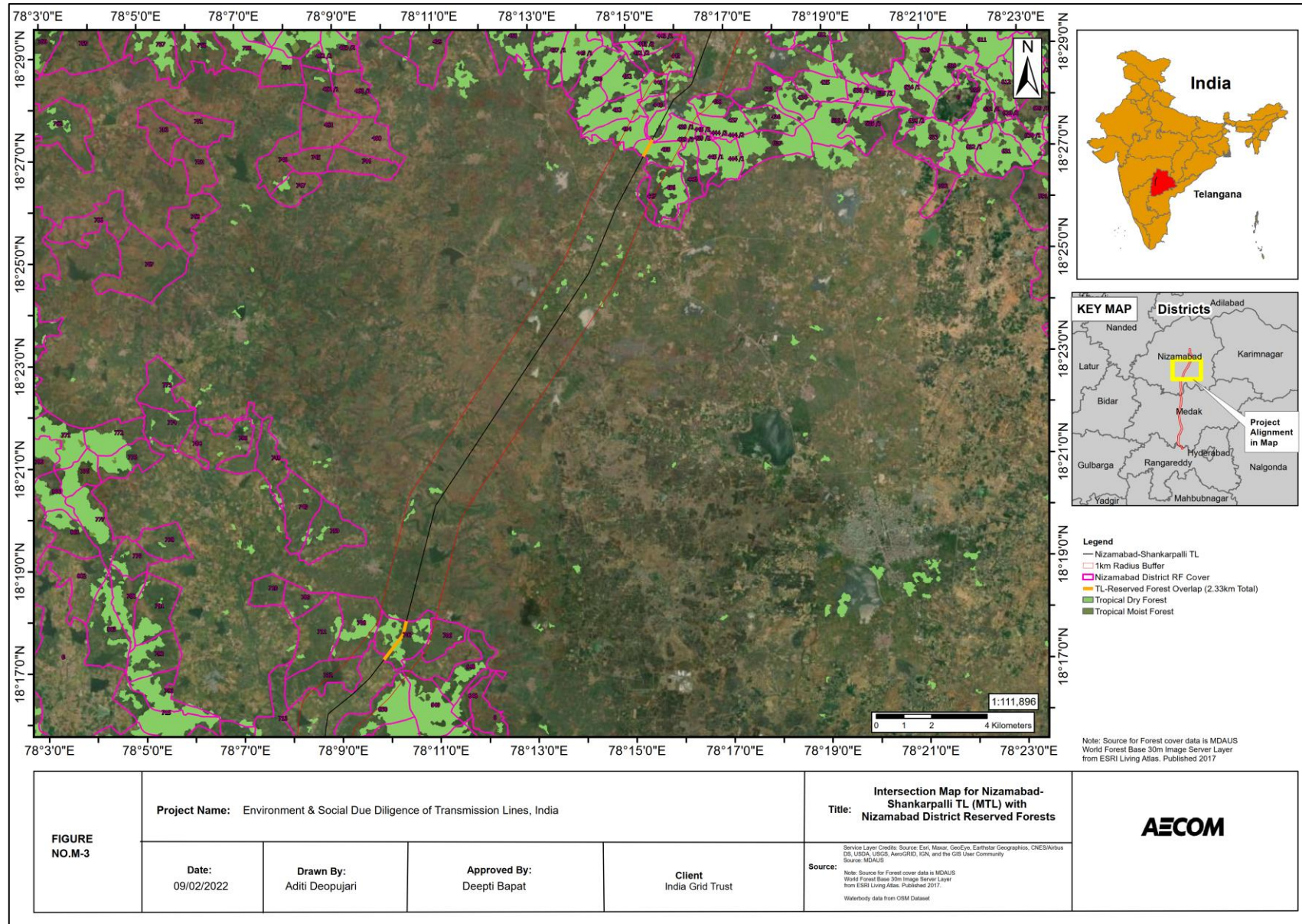


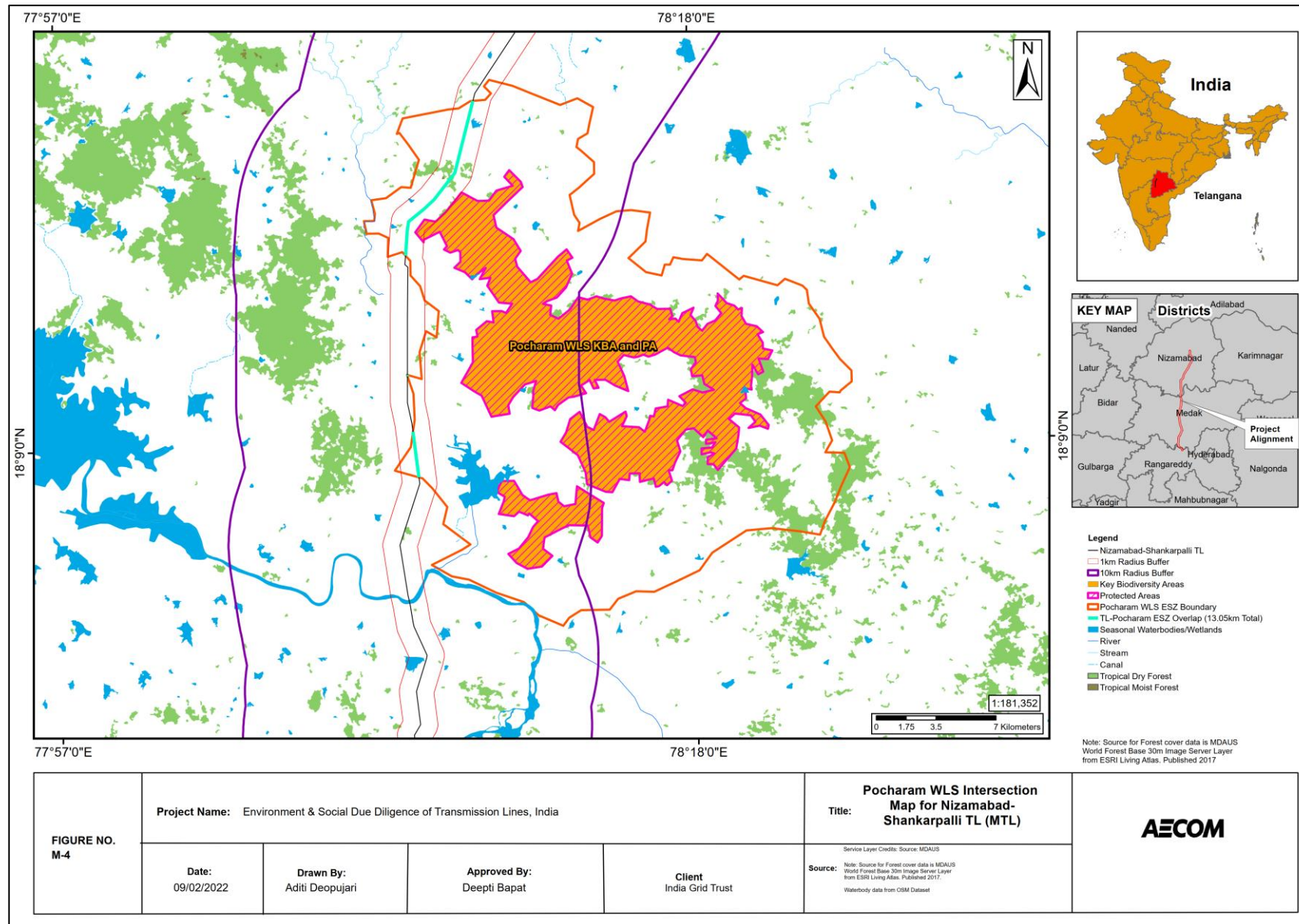


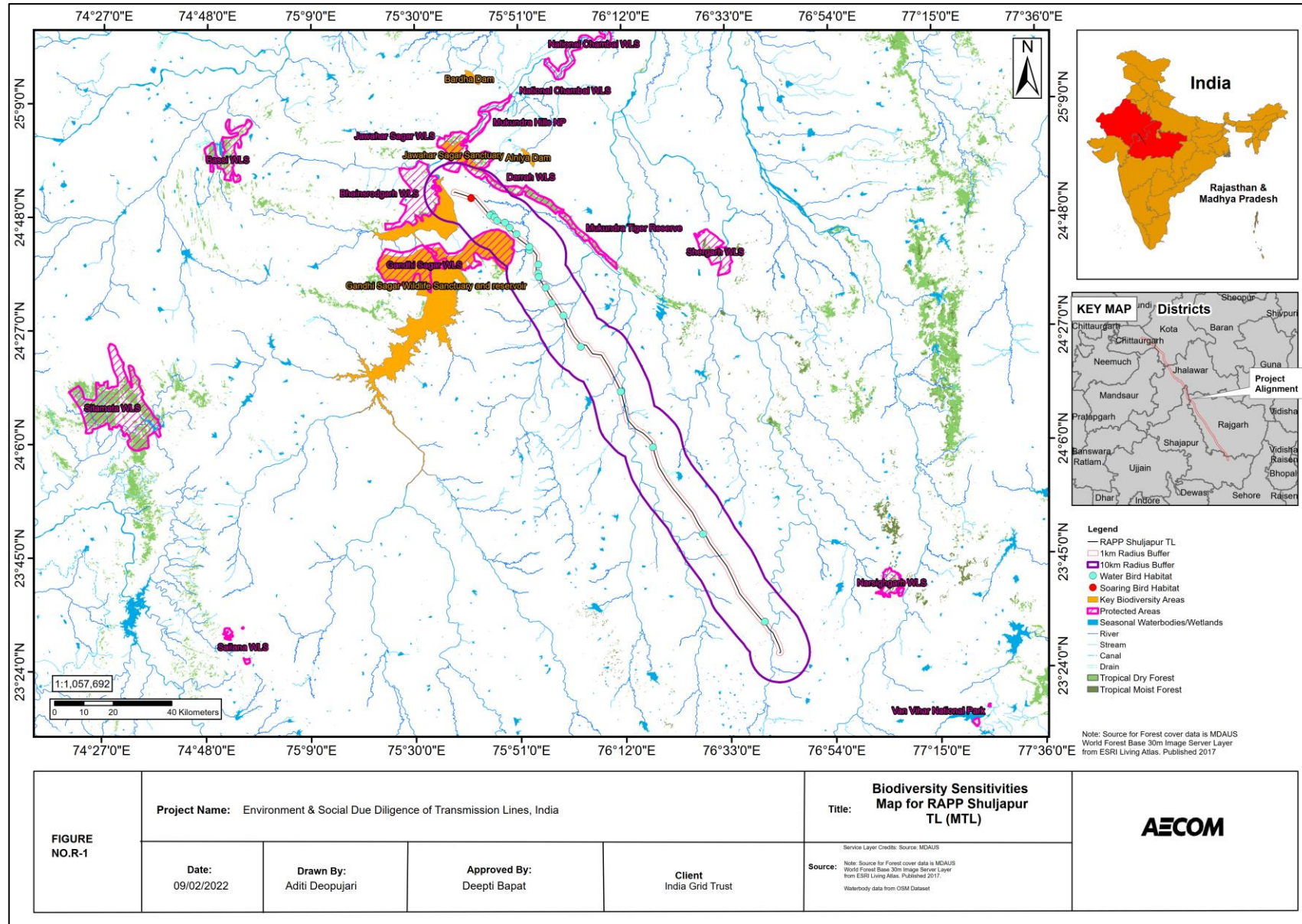


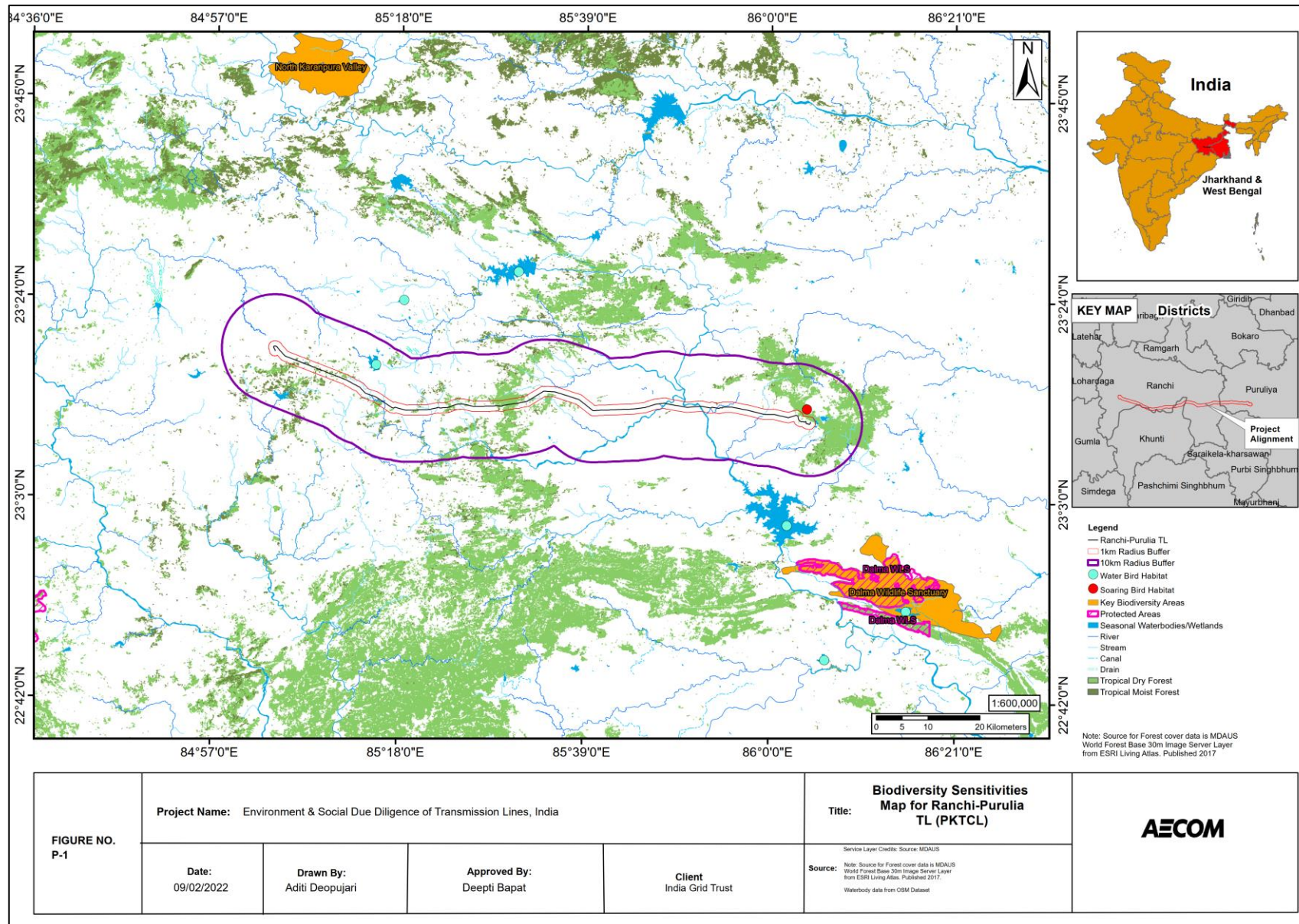


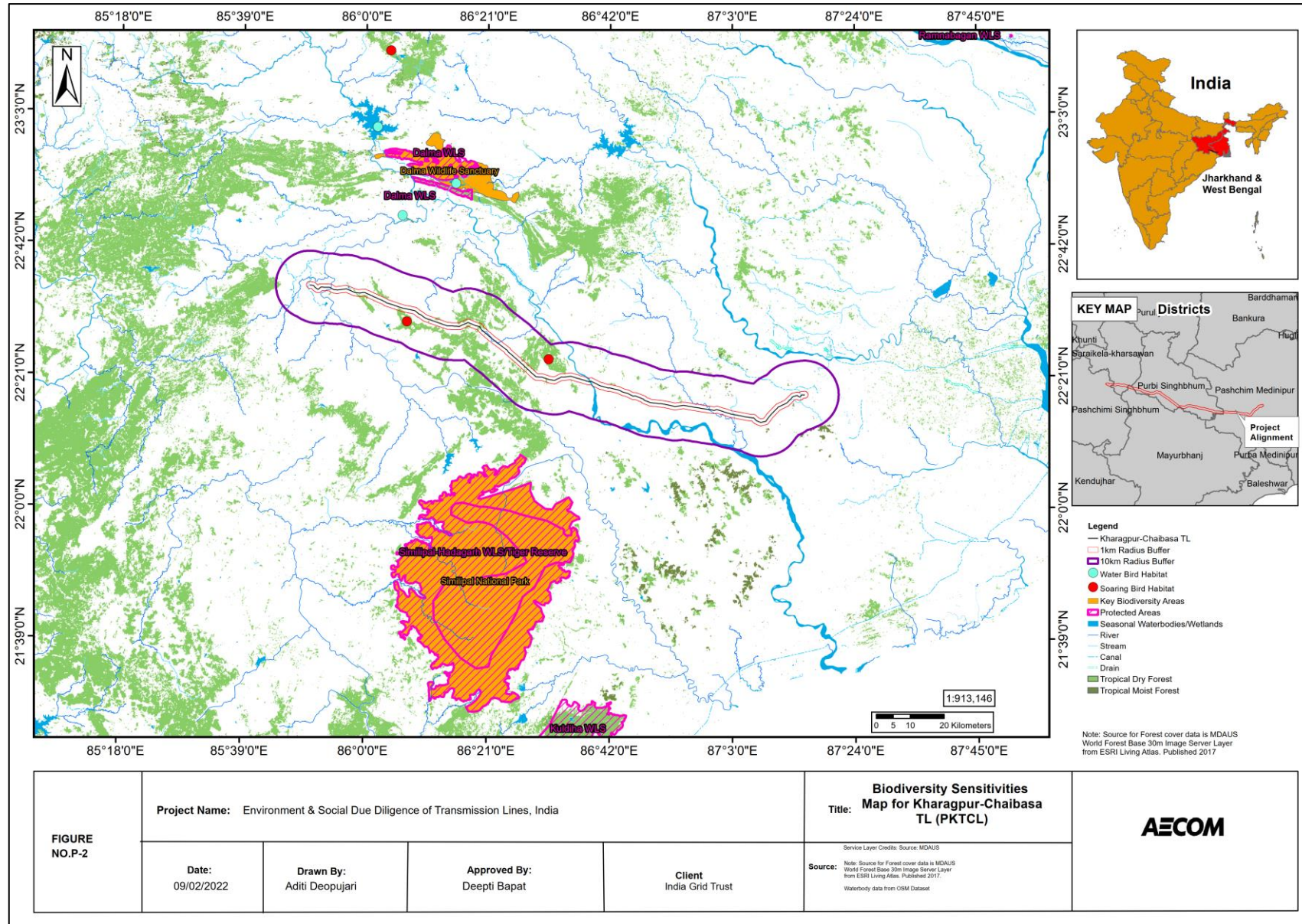


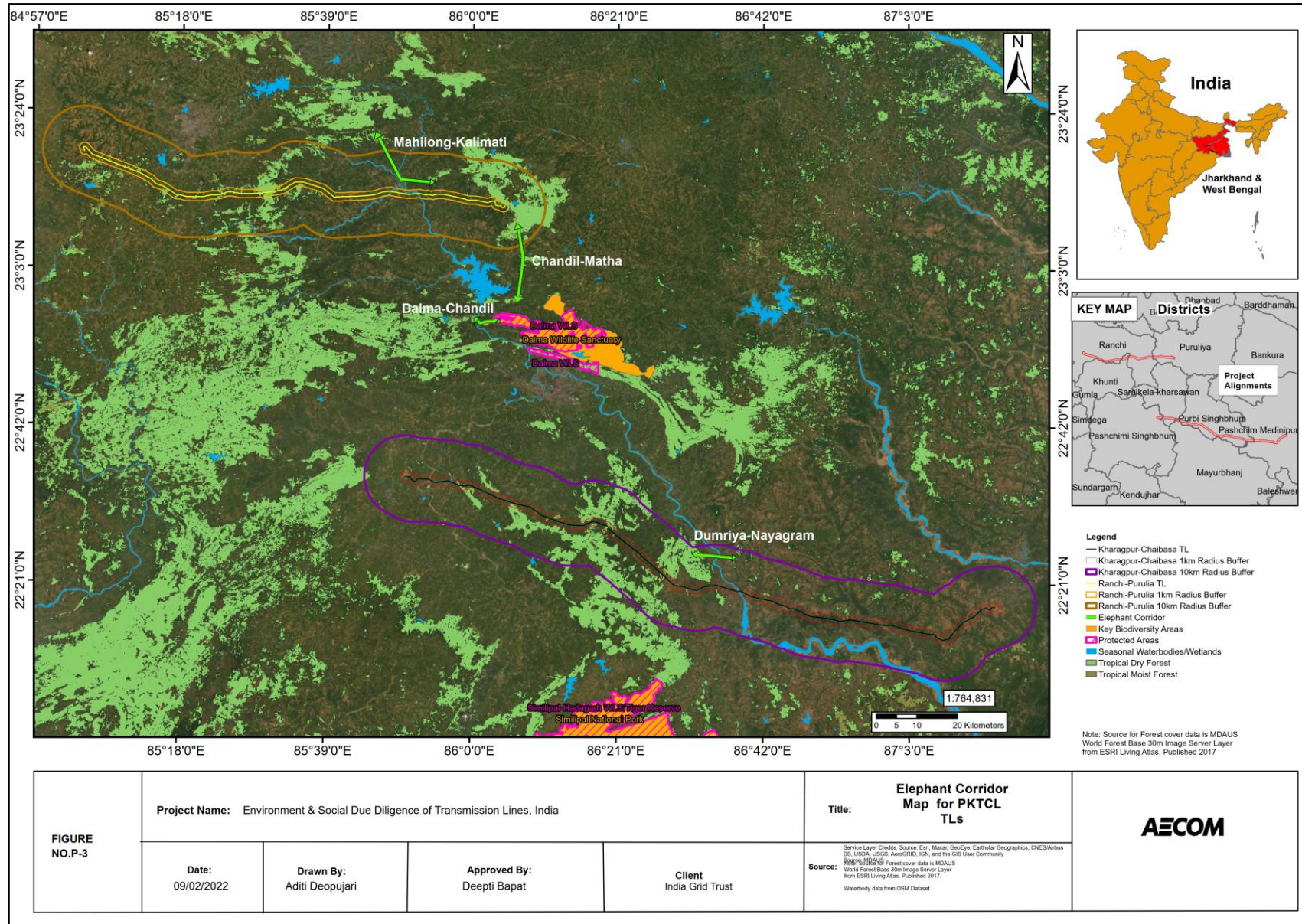


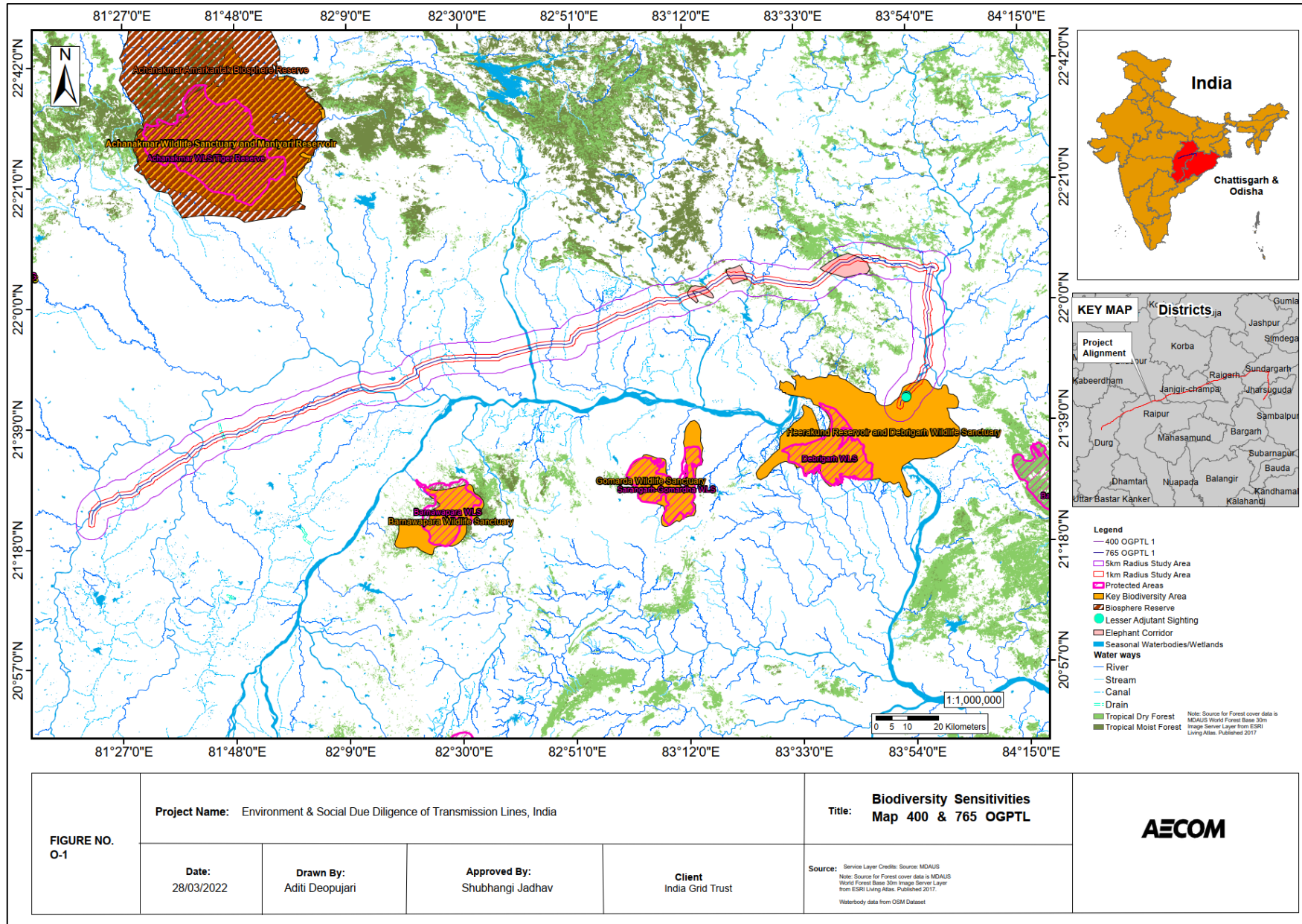












Appendix F Consultations Details

General Information	
Location: Jharkhand and Chhattisgarh	Date: 02/02/2022 & 05/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: IndiGrid	

Main purpose of consultation	
Client consultation on their documentation/ trainings etc.	
Points for Discussion	
1.	<p>Chhattisgarh (Mr. Imam (HSE head, central India), Jharkhand (Mr. Tutul Sinha, Line manager PKTCL)</p> <ol style="list-style-type: none"> 1. Documentation review of HIRA, incident/accident reporting, trainings, mockdrills etc. 2. Organisation structure, EHS organogram and how the information flows, roles and responsibility 3. Different work orders and CTO's issued by the government. 4. Permit to work issued and how it is granted, who issues it etc. 5. How the daily EHS activities are planned, and the review meetings held, how frequently etc. 6. Frequency of mock drills, topics covered in each and how many of the workers attend them. Similar for trainings. 7. How the grievances are addressed, common email is in place 8. PUC of the vehicles (both contractors and client's) 9. UAUC points 10. Internal complaints committee is in place but there were no complaints till date. 11. Responsibilities of Line manager and their daily planning of the work, communication with the contractor's side etc. 12. How is the patrolling work scheduled 13. How is the waste managed (if there's segregation of waste done, how it is disposed etc) 14. CSR committee when will be formed and what all activities are scheduled to happen. 15. Details on the Zoho portal, which happens to be portal will the employee related details.

General Information	
Location: Khariyabanda Village, Dhulipada Village, Jharkhand	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Landowners	

Main purpose of consultation	
Landowner Details	
Points for Discussion	
1	<p>Landowner 1</p> <p>Name: Punnu Chandra Munda, age 60 years, Munda Tribe (ST)</p> <ul style="list-style-type: none"> • Documentation work was done but he didn't have any to show so the area of the land was not known. • INR 25000 were paid for the foundation work and in total INR 1,30,000 were paid for cutting trees (mahua, sal and aam) • Apart from this the compensation for 27 bamboo trees were not paid which were falling in the line

	<ul style="list-style-type: none"> In 2020 more sal trees were needed to be trimmed for which he was contacted when he mentioned that the permission will only be granted if he gets compensation for those 27 bamboo trees as well. After which in the year 2021 he was given INR 52000 for both (sal and 27 bamboo). In Getting this amount gram Pradhan also helped him who happens to be his cousin brother. No such legal case or anything was filed against the compensation problem. After contacting the gram Pradhan we got to know that only for the paper work of the land, he was contacted and no such thing was done before the start of the project. He grows dhan, rice and don't have any tractor for the purpose of farming, uses buffalo for this purpose. They don't have any problem with the operation and maintenance activity performed. It's just that while excavating pit for tower erection the ground was not levelled due to which he faces problem in farming. No structural damages caused
2.	<p>Landowner 2</p> <p>Name: Birendra Jamudar, aged 50 years; ST Ho tribe, Village Dhulipada, Rola Post office</p> <ul style="list-style-type: none"> Main occupation agriculture, mainly rice which is rain dependant Water for drinking and domestic use from hand pump provided by govt. Total land owned – 2 acres Company approached him about the project Documentation was signed before the construction began, but all records were taken back by the company, and at present he has no documentation Approx. 5 trees on the land where tower was constructed – Potas and Arjun type – full compensation was received after cutting of trees Crop compensation was received before construction by cheque, tree compensation was received directly in the account – approx. INR 1.5 lakh compensation for both crop and trees, does not remember how much compensation per tree His family has been living here since the Britishers' time, govt. did not allotted him the land nor his family bought the land from someone. House is made of mud, and timber collected from the forest. Other forest produce used include Sal, tendu, and fish from a lake in the village area No restrictions during construction period, no damages incurred during construction, and was told that construction will only begin after harvest, which was followed by the company

General Information	
Location: Office of the Divisional Forest Officer, Bilaspur	Date: 02/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Range Forest Officer Achanakmar Tiger Reserve (Ajay Sharma)	

Main purpose of consultation	
To understand flora fauna of the Study Area and possible impact or mitigations measures	
Points for Discussion	
1	As per the RFO, Kopra Dam in Takhatpur is a congregation site for waterbirds
2	There is human-elephant conflict in Chhattisgarh with records of elephant collision with distribution lines, however no reports of elephant collisions with high-tension transmission lines
3.	The forest department works for removal of invasive species
4.	Recently, a survey on distribution of vultures has been initiated by the forest department. Presence of vulture species such as Egyptian Vulture, Indian Vulture and Long-billed Vulture is reported.



General Information	
Location: Bilaspur	Date: 02/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: O & M (Telegence) Engineer Sonu Kumar Yadav	

Main purpose of consultation	
To understand labour-related conditions	
Points for Discussion	
1	He stays in a guesthouse provided by O & M in Bilaspur, which is a 2BHK with 2 people per room, Each room has attached bathroom and toilet (combined)
2	Water is available for two hours every morning and evening, which is stored in an storage tank of approx. 500 litres, which sometimes also overflows. This water is used in the washrooms
3	Drinking and cooking water is bought as cans of 20 litres of which they get 4 cans
4	The kitchen is separate, nobody has needed to sleep there as of yet
5.	Waste disposal -municipal corporation every morning
6.	First aid box is available in the guest hour, which is checked every month and updated when necessary
7.	The O & M manager visits every 3 months, IndiGrid staff does a monthly check
8.	Security guards – third party agency called Safeguard and Manpower Services
9.	The security guards' salary is paid through the third party agency, which raises an invoice at the end of every month, which is processed by O & M within 5 days

General Information	
Location: Gatauri Village, Pipana Village, Chhattisgarh	Date: 02/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Landowners	

Main purpose of consultation	
Landowner Details	
Points for Discussion	
1	<p>Landowner 1</p> <p>Name: Mohammed Faizal Khan, age 48 years, General category</p> <ul style="list-style-type: none"> Farmer, rice and wheat, owns a tractor Other occupation – transport He does not remember how much land was given for tower, where 3 feet of the tower are in his farmland and one on the border – but the measurements were done in front of him after which he was given a paper which had to be signed by the Sarpanch (consent type of document), but he doesn't have the documentation Two Palash trees were to be cut – compensation was promised but was delayed, received it after 3 months – INR 25000 per tree and approx. INR 15000-20000 for the crop, money was directly credited to the account There was no meeting by the Panchayat about the upcoming project, company people directly approached him The concerned land is now sold to a developer
2	<p>Landowner 2</p> <p>Name: Ganga Singh, aged 62 years; consultation with his son: Ram Lal Gondia, age 32 years, SC (Gonia caste) Village Gatauri</p>

	<ul style="list-style-type: none"> • Main occupation agriculture, rice for two seasons • Have their own borewell and one tractor, total land 2 acres • Does not remember the compensation amount – but full compensation paid for crop and approx. 2 trees within 2 to 2.5 months • Company approached for land, but Sarpanch was also involved in informing about the project in 2014 • The company gave a paper which had to be authenticated with Sarpanch's signature • No restrictions or damages during the construction as well as operation and maintenance
3	<p>Landowner 3</p> <p>Ranvijay Singh, 30 years, land in father's name, General category (Chhatri Thakur) Village: Pipana, Selar Panchayat</p> <ul style="list-style-type: none"> • Main occupations agriculture – rice, wheat, chana • Owns one tractor • Total land approx. 11 acres • Company people approached them about the project • Does not remember much else about documentation, compensation, etc.

<i>Photo Documentation</i>	
<i>Landowner consultation</i>	<i>Landowner consultation</i>
	

General Information	
Location: Office of the Assistant Conservator of Forests, Jamshedpur	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: PKTCL
Stakeholder Group: Assistant Conservator of Forests, Jamshedpur, Mr. A.K. Chaudhari	

<i>Main purpose of consultation</i>	
To understand flora fauna of the Study Area and possible impact or mitigations measures	
<i>Points for Discussion</i>	
1	Elephant movement is in entire Jamshedpur District, especially in Gurabandha, Mosabani Range
2	Vultures are not so common in Jamshedpur, but there are few migratory waterbirds
3	Local communities or forest dwellers and tribal communities extract the following from the forests: fuelwood, mahua, saal seed, saal leaf, chironji, Amla, Tendu, other medicinal plants, water for domestic use; fishing and collection of honey happens on small scale

General Information	
Location: Office of the Divisional Forest Officer, Saraikela, Jharkhand	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: PKTCL
Stakeholder Group: Divisional Forest Officer Saraikela, Mr. Aditya Narayan	

Main purpose of consultation	
To understand flora fauna of the Study Area and possible impact or mitigations measures	
Points for Discussion	
1	Chandil Dam and Sitarampur Dam are known congregation sites near Saraikela. More information can be obtained from the Avian Census conducted by BNHS
2	Elephants found in this region largely migrate from Odisha and West Bengal, traveling to Dalma Wildlife Sanctuary
3	The forests in Saraikela range are fragment, largely Protected Forests surrounded by human settlements
4	The elephant movement is throughout the year, but especially during the sowing and post-harvest season, posing as menace to local people
5	During 2019, there was a report of elephant electrocution due to distribution line. No such reports are present for high-tension lines.
6	There are no records of collision due to high-tension lines, except possibly Indian Peafowl
7	Locals extract fuelwood, amla, mahua and fish from the forest and nearby waterbodies. Water from waterbodies inside the forest is also extracted.

General Information	
Location: Forest near TL, Chingara village, tola Birgoda Jharkhand	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Forest Dwellers, non-landowner (Name: Vishu Murmur, Chota chath Kisko, Kadeh Murmur, age 35-40, Santhal (adivasi))	

Main purpose of consultation	
To understand dependency of forest dwellers	
Points for Discussion	
1	Near Tower number 42/12, coordinates (22° 22'38"N 86° 27'18"E), Village: Chingra, tola: Birgoda.
2	Regularly uses the forest area for fuelwood. All were farmers who grow rice.
3	In total there were 14 houses in that village and most of them were farmers.
4	They were not restricted in accessing the forest area during the construction period of the TL or later.
5	There was no intimation from gram panchayat before the construction of the towers were commissioned. Gram Panchayat: Artakwali
6	No person from gram sabha or company visited them to tell about the TL before the construction being made
7	As per them the transmission lines were constructed approximately 6 years ago and haven't faced any such problems.
8	In the forest didn't see any of the dead animal majorly due to the TL

Photo Documentation	
Forest Dwellers	
	

General Information	
Location: Jamshedpur	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Amit Upadhyay (JBS enterprises Pvt. Ltd.)	

Main purpose of consultation	
To understand labour-related conditions	
Points for Discussion	
1	Contractor worker stays in a guesthouse provided by O & M in Ghatshila, Jhargram and Ranchi, which happens to be the 3 hubs in the entire asset. For K-C line guest house in each has 3 rooms with attached bathroom facility and kitchen whereas for P-R line 4 rooms are there with bathroom and kitchen facility also provided.
2	For drinking water – 20 L mineral water CAN provide by the company. For bathing – normal boring water (in all 3 hubs). Rent, Electricity, kitchen utensils (not the daily vegetables etc) are provided by the company to the workers.
3	Waste: They collect the wastes in dustbins in all the 3 hubs and then they themselves go and throw in a dedicated area provided by the government, which as per them is a closed periphery and not an open dumping zone. (photos of their dustbins were asked)
4	2 guards at a storeroom in ghatshila. Whenever guards take leave then one of the helpers takes charge from the team. They don't have a separate uniform but carry their I 'cards with them
5	As part of Equipment's – Guards are given safety shoes, hand gloves, torch from the company.
6	First aid box is available in the guest house, which is checked every month and updated when necessary
7	The O & M manager visits every 3 months, IndiGrid staff does a monthly check
8	Security guards at the storerooms are provided from the contractors side only.

General Information	
Location: Forest near TL, Chingara village, tola Birgoda Jharkhand	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Parikshit Murmur (age 53) member of the community worshipping Sarna land	

Main purpose of consultation	
To understand their belief and the importance of Sarna land to them.	
Points for Discussion	
1	Tower number 45/9 coordinate (latitude: 22.43761423537807, longitude: 86.37998275458813), Village: Bankati.
2	7-8 group of trees – Java plum (Jamun) –1 Charla –1 Sal – 5-7 trees Sarna Sthal/location is 200-250 years old.
3	They worship the trees once an year in the month of February. Village consists of Approximately 25 houses which are all of Sarna samuday and offer bali of bakri, pathri, murga etc. People in the village belongs to Santhal samuday
4	They were not restricted in accessing the forest area during the construction period of the TL or later.
5	People have issue that some of the leaves which are very near to the line are falling or getting dry and this needs to be taken care.
6	Apart from these group of trees there were some other trees as well which doesn't fall in their village and is 1.5-2kms away from their area. Name of the village is gajidih which has 10-15 houses out of which 4-5 houses are of Sarna people. Mr. Parikshit Murmur said that they also faced the same

issue but as they were less in numbers so they couldn't do much and the lines were made to pass from that area.

<i>Photo Documentation</i>	
<i>Sarna consultation</i>	<i>Sarna consultation</i>
	

General Information	
Location: Bankati village dumariya district, Chhatisgarh	Date: 04/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Parokshit murmur, age 53	

<i>Main purpose of consultation</i>	
To understand their concern with the project	
<i>Points for Discussion</i>	
1	70% of the people in this village are ST.
2	No intimation form company's side about the construction and the harm associated with it. .
3	Neither the project officials nor any person from gram sabha made them aware of the project.
4	He was not sure if there was any gram sabha meeting held for the same

<i>Photo Documentation</i>	
<i>Schedule V consultation</i>	
	

General Information	
Location: Forest near TL, Bangar village, Chhattisgarh	Date: 01/02/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: JTCL
Stakeholder Group: Forest Dwellers, non-landowner (Name: Adarshin, age 27, Gond Tribe)	

Main purpose of consultation	
To understand dependency of forest dwellers	
Points for Discussion	
1	Village: Bangar, Sendurkhar, Pandariya Tehsil of Kabeerdham district – living here since 5 generations
2	Regularly uses the forest area for fuelwood and is a farmer who grows kado, kutki and rice, tractor for the same is rented, farming is rain dependant, no borewell
3	Other forest resources: mahua, tendu, aam, use drinking and domestic use water from river
4	They were not restricted in accessing the forest area during the construction period of the TL or later.
5	There is a gram sabha but they don't attend it so were not aware if there was any discussion related to TL.
6	No person from gram sabha or company visited them to tell about the TL before the construction being made
7	The village has approx. 20-25 Gond houses, and one Dhoba tribe household
8	For market needs, they go to Neoor in Kui village using a rented bike

Photo Documentation	
Consultation with Forest Dwellers	
	

General Information	
Location: Project Site	Date: 30/01/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: RTCL
Stakeholder Group: RTCL Project Team (Mr. Vikas Malik, Mr. Raman)	

Main purpose of consultation	
To understand the overall project setup and operation and maintenance procedures	
Points for Discussion	
1	Project setup- land breakup, total number of towers, RoW features, general topography and land use

2	Overall maintenance and operation procedures
3	Contractor details
4	EHS practices and team details
5	Compensation procedures
6	

General Information	
Location: Yellaram, Tower no. – 14/0	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

Main purpose of consultation	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	
Points for Discussion	
1	General information of the landowner – Rajalingam Gangai Yadhav, 32 years of age and belongs to BCD (Yadhav) community - OBC
2	Land procurement process – Mr. Rajalingam was contacted by Sterlite representative Mr. Senthil Nath (during MTL construction stage – April 2016); Land area given is 36 X 36 sq. ft. NOC signed – a written Panchnama submitted to the village Sarpanch, detailing zamin papers, landowners Aadhar card, PAN card.
3	Landowner confirmed that there were no other structures in the land prior; No structural damages caused.
4	Land use is agricultural. Owner grows Corn, Rice (for four months a year)
5	The landowner received a total of Rs. 1,50,000 as compensation, along with the market rate for crops..
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location: Rampally, Lingampet Tower no. – 18/2	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

Main purpose of consultation	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	
Points for Discussion	
1	General information of the landowner – Devaseth Mohan, 35 years of age and belongs to Scheduled Tribe (ST) - Banjara Community
2	The land is his ancestral property, transferred from his Grandfather; History of ownership prior to that was not available. The lands adjacent to this property are owned by his relatives (Reddy Naik, Thourya Naik, Devasath Gopiya Naik; Land area given is 36 X 36 sq. ft. Consent was given in 2016 and compensation was received in 2016 NOC signed – a written Panchnama submitted to the village Sarpanch, detailing zamin papers, landowners Aadhar card, PAN card.
3	Landowner confirmed that there were no other structures in the land prior; The land had one Tek Tree, which was cut. The owner received a compensation of Rs. 10,000 for the same. No structural damages caused.
4	Land use is agricultural. Owner grows Rice
5	The Landowner received a total of Rs. 70,000 as compensation for the land. He is said to have received the amount in three instalments – (1) At the time of laying foundation, (2) During Erection of Tower and (3) During Stringing operations
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location:., Lingampalle Khurd Tower no. – 13/3	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

Main purpose of consultation	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	
Points for Discussion	
1	General information of the landowner – R.Ramulu, 55 years of age and belongs to BCD – Mudharaj Community
2	Land procurement process – Mr. Rajalingam was contacted by Sterlite representative Mr. Senthil Nath (during MTL construction stage –April 2016); Land area given is 120 sq.yard (1 gunta). NOC signed – a written Panchnama submitted to the village Sarpanch, detailing zamin papers, landowners Aadhar card, PAN card.
3	Landowner confirmed that there were no other structures in the land prior; No structural damages caused.
4	Land use is agricultural. Owner grows Maixe
5	The landowner received a total of Rs. 1,20,000 as compensation, along with the market rate for crops..
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location: Tower no. – 19/7	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

Main purpose of consultation	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	
Points for Discussion	
1	General information of the landowner – Kampe Ashagoud, 48 years of age and belongs to BCA - Goud Community. He is the Sarpanch of the Village.
2	Land procurement process – Mr. Rajalingam was contacted by Sterlite representative Mr. Senthil Nath (2016-2017); Land area given is 36 X 36 sq. ft. NOC signed – a written Panchnama submitted to the village Sarpanch, detailing zamin papers, landowners Aadhar card, PAN card.
3	Landowner confirmed that there were no other structures in the land prior; No structural damages caused.
4	Land use is agricultural. Owner grows Rice on the land area
5	The landowner received a total of Rs. 70,000 as compensation, along with the market rate for crops..
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location: Chigunta, Timajipeta, Vanaparthi District, Tower no. – 25/18	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

Main purpose of consultation	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	

<i>Points for Discussion</i>	
1	General information of the landowner – Devarkonda Channabhumeya, 45 years of age and belongs to BC Community.
2	Land procurement process – Signed consent was given. Consent was given on pink paper (and after receiving money). The landowner heard the news of land requirement in 2016. Land area given is 3 X 3 m. Details on the land use was unavailable
3	Landowner confirmed that there were no other structures in the land prior; No structural damages caused.
4	Details on the land use was unavailable.
5	The Landowner does not remember the exact amount of money received. It is reported that the amount was transferred in three installments – 1. Foundation, 2. Erection and 3. Stringing stage of TL.
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location: Bhootpur Tower no. – 25/19	Date: 01.02.2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: Maheshwaram Transmission Limited (MTL)
Stakeholder Group: Landowner	

<i>Main purpose of consultation</i>	
Example – To understand the process adopted for land procurement, status of compensation, and any grievances/concerns associated with the project.	
<i>Points for Discussion</i>	
1	General information of the landowner – Kundeti Channaya, 70 years of age and belongs to ST Tribe - Harijana
2	Land procurement process – The land has been purchased from a Vaishya owner. The landowner does not remember details on who approached for the land. Land area given is 3 X 3 m. Consent form was signed on Red Colour paper.
3	Landowner confirmed that tall trees were present on the land prior; No structural damages caused.
4	Land use is agricultural. 30 years ago, tall trees were present. It was removed after purchase. The landowner plans on cultivating Sunflower from year 2022.
5	Details on compensation received not available.
6	The landowner does not have a problem with the operation and maintenance activity being performed.

General Information	
Location: Jharsuguda	Date: 22/03/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: OGPTL
Stakeholder Group: Indiqrid	

<i>Main purpose of consultation</i>	
Client consultation on their documentation/ trainings etc.	
<i>Points for Discussion</i>	
1	<ol style="list-style-type: none"> 1. Documentation review of HIRA, incident/accident reporting, trainings, mockdrills etc. 2. Organisation structure, EHS organogram and how the information flows, roles and responsibility 3. Different work orders and CTO's issued by the government. 4. Permit to work issued and how it is granted, who issues it etc. 5. How the daily EHS activities are planned, and the review meetings held, how frequently etc.

	<ol style="list-style-type: none"> 6. Frequency of mock drills, topics covered in each and how many of the workers attend them. Similar for trainings. 7. How waste is managed at the office and hubs. Water requirements at various locations (hubs and offices) 8. Safety related aspects observed and discussed with contractor's workers. 9. How the grievances are addressed, common email is in place 10. PUC of the vehicles (both contractors and client's) 11. UAUC points 12. Responsibilities of Line manager and their daily planning of the work, communication with the contractor's side etc. 13. How is the patrolling work scheduled? 14. How is the waste managed (if there's segregation of waste done, how it is disposed etc) 15. CSR committee when will be formed and what all activities are scheduled to happen.
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General Information	
Location: Surguda Village, Mhadepada Village, Orissa	Date: 23/03/2022
Project: Environment & Social Due Diligence of Transmission Lines, India	Asset: OGPTL
Stakeholder Group: Landowners	

Main purpose of consultation	
Landowner Details	
Points for Discussion	
1	<p>Landowner 1</p> <p>Name: Kumarmani Patel, age 60 years, OBC (Aghriya), was contacted in the year 2016 by L&T</p> <ul style="list-style-type: none"> • Village: Surguda, Tower No. 132/2 • Total Land: 1 acres and 10 dismil • Payment of Rs. 80k was paid for 1 tower (all 4 legs). But his demand was of 2 Lacs as per his conversations with other farmers in the nearby area. Apart from this he got 26k for tree trimming (cutting) of sal tree and small branches of bamboo. • Rice in rainy season and Moong and til and peanuts in dry season. • Nearby Gram Panchayat: Chatanpalli • He takes Mahua flowers and fruits, and also wood for fuel in small amount from nearby forest. • His main occupation is farming and also has 3 cows. He sells his produce in the lefripda market which is around 1-2 kms. • He got his consent from from the panchayat.
2	<p>Landowner 2</p> <p>Name: Rathi kisan, aged 55 years; ST (kisan), contacted in the year 2018</p> <ul style="list-style-type: none"> • Total land: 1 acres • Village: Mhadepada, Lefripada region, Tower No. 130/0 • His main occupation is farming and also has 2 goats. He used to do farming once a year but now they have borewells and dam so they are able to do twice. • He got in total Rs. 33k in 3 installments. • He takes Mahua flowers and fruits, and also wood for fuel in small amount, and seasonal vegetables like girel ful from nearby forest.
3	<p>Consultation 3</p> <ul style="list-style-type: none"> • Meet a lady Sadini (landowner: Lubhru Pradhan her father-in-law, age 75 years) • Village: Surguda, Tower No. 132/4. • They didn't had any tower on their land but cutting and trimming of Sinnah trees was done. They got their payment after 25 days in the form of DD (Demand Draft). • While stinging, some of the crops got damaged hence compensation amount was given to them. • She was not aware of the amount they received. Their main occupation is also farming.

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Photo Documentation



Appendix G E&S Screening of IndiGrid Assets

Ranking	Colour Code	Risk factors increase from ranking 1 to 6.
0	Not applicable / No data available	
1	Least Risk Factors	
2		
3		
4		
5		
6	Highest Risk Factors	

IFC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
PS5	Compensation completion status with details on the number of affected people/HH, % compensation complete	2 (100% Compensation for construction stage damages paid. Ongoing legal disputes for pending compensation.)	2 (2.5% of total payable compensation for construction stage damages is balance. Ongoing legal disputes for pending compensation.)	5 (Reportedly, 100% payable compensation for land procurement and construction stage damages has been paid. Supporting documents will be reviewed once shared. Litigations suggest that compensation for land and damages was not paid to some landowners.)	Reportedly, 100% payable compensation for construction stage damages has been paid. Supporting data will be reviewed once shared.	Reportedly, 100% payable compensation for construction stage damages has been paid. Supporting data will be reviewed once shared.	Reportedly, 100% payable compensation for construction stage damages has been paid. Supporting data will be reviewed once shared.
PS5	Approach taken for land take and the regulatory framework used.	Indian Telegraph Act, 1885	Indian Telegraph Act, 1885	Electricity Act 2003 and Indian Telegraph Act, 1885	Indian Telegraph Act, 1885	Indian Telegraph Act, 1885	Indian Telegraph Act, 1885
PS5	Details of the cases and litigations across the assets – include some description of these cases.	6 (17 pending cases at High court, Sessions and District court. Disputes include compensation	5 (6 pending cases at Supreme court, High court, Sessions and District court. Disputes	4 (3 pending cases at High court, Sessions and District court. Disputes include absence of consent before	No pending litigations as reported	No pending litigations as reported	No pending litigations as reported

FC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
		claims for land and damages during construction)	include compensation claims for land and damages during construction)	tower installation and compensation claims)			
PS5	Details of E&S litigation	There were in total 17 litigations reported for this asset. Out of these one was filed in 2016, 4 were filed in 2014 and 2 each were filed in the year 2000, 2001, 2013, 2015, 2017 and 2019 in different courts. 10 cases were filed in order to get the compensation of land where they haven't received the compensation and, in some case, High court of the respective state has asked BDTCL not to walk into the fields and provide the land owners with the compensation. 6 for the compensation-application of GR. The said complaints have been filed by the farmers with a prayer that the MH govt GR with regard to the assessment of the land compensation to be considered. The applicability of the said GR is also challenged	There are 5 Open litigations filed by the individuals accusing JTCL of using their land, without consent and thereby depriving them of their right. These 5 cases were filed in the 2014 in The High court of MP, 2015 in The Supreme Court of India, two cases were filed in 2016 in the district and session court of MP Whereas one case was filed in the High court of MP in the year 2018. JTCL have filed their reply but the petition was again filed and the issue still remains pending. The petitioners have claimed compensation for ROW. One another case is filed by an individual asking for the compensation of trees filed in the High court of MP. In this case the landowner was approached for cutting of the trees but the compensation demanded	There are three pending litigations with respect to the land under this project. Two of these are filed against OGPTCL in 2017 and 2018; whereas it is a party to one litigation filed against the state of Chhattisgarh with respect to project land. In all three cases petitioners complaint that consent was not taken before taking possession of the land for the project. In two of the cases petitioners have demanded for diversion of the transmission line from their land whereas in one case, the petitioner has claimed compensation for the right of way taken for the project.			

FC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
		and is pending disposal, while one had concern for the damages caused to land by laying high tension power transmission lines.	was not found genuine hence the case.				
PS5	Common area/Grazing areas/panchayat lands/community Forest allocated for the project across the assets, and if there is any documentation for it.	1 (Grazing area allotted for Substation by District Collector)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	4 (Sacred groves called 'sama' in the Bihar-Jharkhand states was procured for the project by Developer. No pending disputes known. Sterlite adopted a two-pronged approach of modifying our line construction plan and simultaneously working with the religious leader to manage the minimal unavoidable felling of trees. Out of respect for the community's beliefs, the project's route underwent a deviation at 2 towers (45/0 and 60/0) in Kharakpur-Chaibasa line. Sterlite engaged multiple stakeholders. https://www.sterlitepower.com/community/religious-beliefs-and-biodiversity-conservation-sterlite-power-case-study
PS5	Status/details of settlement under the FRA 2006	4 (172 hectares of Forest land. Whether or not FRA	6 (535 hectares of Forest land. Based on secondary data, FRA certificate	4 (166 hectares of Forest land. Whether or not FRA	2 (22 hectares of Forest land. Whether or not FRA	2 (15 hectares of Forest land. Whether or not FRA	4 (Sacred groves called 'sama' in the Bihar-Jharkhand states was

FC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
	wherever forest clearance has been obtained.	2006 is triggered or not is not known at this stage.)	received from 3 Forest Divisions and applied for and pending in 2 Forest Divisions in 2014.)	2006 is triggered or not is not known at this stage.)	2006 is triggered or not is not known at this stage.)	2006 is triggered or not is not known at this stage.)	procured for the project by Developer. Reportedly, project considered deviation of TL at 2 towers (45/0 and 60/0) in Kharakpur-Chaibasa line to protect the sacred land. No pending disputes known.)
PS7	If there is any common property area being impacted	1 (Grazing area allotted for Substation by District Collector)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	(Reportedly, line does not pass through such land)	4 (Sacred groves called 'sama' in the Bihar-Jharkhand states was procured for the project by Developer. No pending disputes known.)
PS7	Approximate Kms of line passing through Scheduled V areas (including number of villages) for each asset where relevant, and if Gram Sabha consent was taken according to PESA.	5 (Approximately 74Km under Schedule V area.)	5 (Approximately 80Km under Schedule V area, as per secondary information, No Objection Certificate (NOC) was obtained from all the affected villages.)	5 (Approximately 95Km under Schedule V area)	1 (Not under Schedule V area)	1 (Not under Schedule V area)	6 (Approximately 158Km under Schedule V area)
PS 6	Share ranking for six T-lines based on: a. Risk to soaring birds. This can a brief narrative on the known populations/flyways at a State or province level where the transmission lines traverse. No need for a full referenced analysis – just an outline of what the relative risks are (if known). b. Loss of natural habitat. Again a brief narrative on the	(a) The Indore-Jabalpur component of the TL overlaps Halali Reservoir KBA+IBA, the trigger species for which comprise 2 soaring bird species (CR Gyps bengalensis & CR Gyps indicus (b) As per a research paper (dated 2020), the Indore-Jabalpur component of the TL overlaps tracts	(a) As per a research paper (dated 2020), the TL overlaps tracts identified as habitat of 6 soaring bird species (resident CR Gyps bengalensis, CR Gyps indicus, CR Sarcogyps calvus & EN Neophron percnopterus and migratory NT Gyps himalayensis & LC Gyps fulvus) (b) An	The TL overlaps the Heerakund Reservoir & Debrigarh WLS KBA+IBA, the triggers for which include 3 soaring bird species (VU Aquila clanga, VU Aquila hastata & VU Halieetus leucoryphus) Loss or degradation of at least 166 ha of potential natural habitat	The northern end of the TL is situated approximately 1 km from the Gandhi Sagar KBA+IBA, the triggers for which include no soaring bird species. Loss or degradation of at least 22 ha of potential natural habitat.	An approximately 1 km section of the TL is situated approximately 950 m from the northern boundary of Pocharam WLS KBA+IBA. KBA triggers comprise 1 soaring bird (CR Gyps indicus) & 1 water bird (EN Rynchops albicollis), both resident. An approximately 3.25 km section of the TL overlaps	A section of the Ranchi-Purulia component of the project alignment overlaps the Ajodhya Hill Forest Reserve, identified by the Wildlife Trust of India as part of an Elephant Corridor, which is deemed a critical movement channel for Elephas maximus (Asian Elephant; IUCN Red List Status: EN)

FC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
	length/area of natural habitat loss for each line since 2012. c. KBAs/Pas- Please indicate if the KBA/PA has values that are at higher risk due to transmission lines. This would be where soaring birds are known from the KBA/PA. KBAs that don't have soaring bird triggers should be considered "less risky". Please also include how much length of T-line is passing through IBA/any wildlife reserve etc. and indicating what would be possible mitigation (e.g. bird diverters if passing through Imp bird area). AECOM to include some details on what would be implications of those on the project (e.g. IBAT may list GIB/LF but is that a possible scenario based on actual presence).	identified as habitat of 7 soaring bird species (resident CR Gyps bengalensis, CR Gyps indicus, CR Sarcogyps calvus & EN Neophron percnopterus and migratory NT Gyps himalayensis, NT Aegyptus monachus & LC Gyps fulvus) Loss or degradation of at least 172 ha of potential natural habitat.	approximately 60 km section of the TL is situated at a distance of approximately 5-10 km from the Achanakmar WLS KBA+IBA, the trigger species for which include 3 soaring bird species (CR Gyps bengalensis, CR Gyps indicus & LC Butastur teesa) An approximately 50 km section of the project alignment overlaps the nationally designated Kanha - Achanakmar Tiger Corridor, which is deemed a critical movement channel for Panthera tigris (Tiger; IUCN Red List Status: EN) Loss or degradation of at least 535 ha of potential natural habitat.			the ESZ of the WLS An approximately 5 km section of the TL is situated approximately 5.5 km from the eastern boundary of Manjira WLS KBA+IBA. KBA triggers comprise water birds, including EN Rynchops albicollis Loss or degradation of at least 15 ha of potential natural habitat.	Loss or degradation of at least 105 ha of potential natural habitat.
	Soaring bird risk	6	6	4	2	3	5
	Water bird risk	6	1	4	1	5	6
	Natural habitat loss (since 2012)	5	6	1	3	2	4
	KBA Overlap/Proximity	6	1	4	2	3	5
	GIB risk	6	-	-	-	-	-
	LF risk	6	-	4	-	5	-
	Potential endemics	?	?	?	?	?	?

FC PS	E&S Screening Aspects	BDTCL	JTCL	OGPTL	RTCL	MTL	PKTCL
	Elephant	-	5	-	6	-	4
	Tiger	-	6	-	5	-	-
	Cumulative Risk ranking – PS 6	6	4	3	3	3	5
PS3	Evacuating power from thermal/ nuclear power plants	Transmitting power between Substations	Transmitting power between Substations	6 (One of the two lines evacuating power from Thermal Power Plant)	5 (Single line evacuating power from a Nuclear Power Plant)	Transmitting power between Substations	Transmitting power between Substations

