

# Resettlement and Livelihood Restoration Plan

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## India: Engie Solar Power Project

Prepared by AECOM India Private Limited and ENREN Energy Private Limited for the Asian Development Bank (ADB).

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AECOM



# Draft Resettlement and Livelihood Restoration Plan (RLRP) for 400MW Solar Park in Surendranagar; Gujarat

ENREN Energy Private Limited

24<sup>th</sup> January 2024

## Quality information

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## List of Abbreviations

SNo.	Abbreviation	Extension
1.	AC	Alternating Current
2.	ADB	Asian Development Bank
3.	AECOM	AECOM India Private Limited
4.	CPR	Common Property Resources
5.	CSR	Corporate Social Responsibility
6.	DC	Direct current
7.	EHS	Environment, health and safety
8.	ESCA	Environmental and Social Compliance Audit
9.	ESIA	Environmental and Social Impact Assessment
10.	FMB	Field Measurement Book
11.	FRV	Full Replacement Value
12.	GIS	Geographic Information System
13.	GRM	Grievance Redressal Mechanism
14.	GSS	Grid Sub Station
15.	HTL	High Tension Line
16.	INR	Indian rupee
17.	IP	Indigenous Peoples
18.	IR	Involuntary Resettlement
19.	KM	Kilometre
20.	kV	kilovolt - unit of electrical potential equal to 1000 volts
21.	KYC	Know your customer / Client
22.	LA	Land Acquisition
23.	LFS	Load Flow Study
24.	LT	Low Tension
25.	MoEF&CC	Ministry of Environment, Forest and Climate Change
26.	MW	Megawatt
27.	NCES	Non-Conventional Energy Sources
28.	NH	National Highway
29.	NOC	No Objection Certificate
30.	NRRP	National Rehabilitation & Resettlement Policy, 2007
31.	OBC	Other Backward Caste
32.	PAH	Project Affected Households
33.	PAP	Project Affected People
34.	PHC	Primary Health Centre
35.	PSS	Pooling Substation
36.	R&R	Resettlement & Rehabilitation
37.	RLRP	Resettlement and Livelihood Restoration Plan
38.	RFCTLARR	The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act
39.	ROW	Right of Way

<b>SNo.</b>	<b>Abbreviation</b>	<b>Extension</b>
40.	SC	Scheduled Caste
41.	SEP	Stakeholder Engagement Plan
42.	SH	State Highway
43.	SIA	Social Impact Assessment
44.	SIMP	Social Impact Management Plan
45.	SPP	Solar photovoltaic power plant
46.	SPS	Safeguard Policy Statement
47.	ST	Scheduled Tribe
48.	TL	Transmission Line
49.	TSR	Title Status Report
50.	Wp	Watt peak

# 1. Introduction

ENGIE is an energy company with a presence in 70 countries with an installed capacity of 115 GW. ENGIE develops its businesses (power, natural gas, energy services) around a model based on responsible growth to take up today's major energy and environmental challenges: The Group provides highly efficient and innovative solutions to individuals, cities and businesses by relying on diversified gas-supply sources, flexible and low-emission power generation as well as unique expertise in four key sectors: independent power production, liquefied natural gas, renewable energy and energy efficiency services.

Over the past 10 years in India, Engie has created a portfolio of 1103.18 MWp solar power capacity and are already in operational phase under different state and central schemes<sup>1</sup>.

AECOM India Private Limited (hereinafter referred to as 'AECOM') has been appointed by ENREN Energy Private Limited to develop the Resettlement and Livelihood Restoration Plan (RLRP) for the proposed 400MW solar power project and the associated 33kV Transmission line connecting the project site and Pooling Sub-station. The RLRP will form the basis to study the impacts and to determine the compensation to be paid for any unanticipated impacts associated with land access and in procurement of land for the project.

This RLRP will be used by client and updated, as required, upon finalisation of land area with details of defined affected households, whose impacts will be assessed, entitlement matrix will be inserted, compensation calculation based on full replacement value (FRV) will be included along with implementation plan and resource arrangements and schedule.

## 1.1 Objective

The objective of developing RLRP is as follows:

- Developed an RLRP for any project-created involuntary displacement impacts principally focused on the government land currently used by farmers. The RLRP will also capture, as necessary, other involuntarily displaced persons or households resulting from project activities.
  - Prepared an RLRP for project land requirements will align with national legal requirements and ADB SPS (2009). The focus will be on permanent and temporary displacement on the project site but may also apply to other project components (e.g., access roads) that are yet to be acquired if required.
  - RLRP includes livelihood restoration measures to address economic displacement impacts due to the Project's land use rights acquisition and land use restrictions in establishing all project facilities and components.
  - The objectives of the development of an RLRP through data collection, analysis, consultation, and planning has been to:
    - ❖ Avoid or minimize involuntary resettlement wherever possible by exploring Project and design alternatives and an approach that adopts a negotiated settlement approach to land access.
    - ❖ Ensure adequate and fair compensation and livelihood restoration measures to land users (both titled and untitled) for all affected assets, ensuring they are no worse off in real terms relative to pre-project levels; and
    - ❖ Ensure poor and other vulnerable groups affected by Project land requirements are identified and their living standards are restored or improved.

## 1.2 Approach and Methodology

The Resettlement and Livelihood Restoration Plan (RLRP) specifies the procedures to follow and the actions to take to assess the impacts, mitigate adverse effects, establish entitled PAHs, compensate losses based on SR2 and applicable Indian legislation, and provide development benefits to persons and communities affected by a project. The rate of compensation for lost assets must be calculated at full replacement cost. In addition to the simple data on inventories of affected assets, investigations and consultation were made to examine the social, environmental, and economic conditions beyond simple physical inventories. The RLRP was developed in draft form while land acquisition is ongoing with no sale deeds finalized. The findings, interpretations, conclusions made in this plan are based on the limited consultation made. Final status of land transactions, project induced

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<sup>1</sup> Detailed Project Report

vulnerability, status on compensation at FRV, Transmission line route alignment and associated impacts, etc. to be updated by EEPL in the plan after completion of land acquisition process.

### 1.3 Methodology in Identifying the Project Affected Families / Persons and Project Associated Impacts

- **Mapping:** Using GIS tools, the project affected area (including Project area and Transmission Line RoW) is being studied for the natural vegetation, land use patterns, Forest cover, Waterbody, infrastructure facilities, etc. being mapped the data is being used to understand the study area villages and their dependency and association to various natural and common property resources.
- **Review of Project Records:** Review of land records, process of land procurement, consultation with the revenue officials (to understand the availability of grant/ ST land in the region, prevailing government circle rate, etc.), consultation with land aggregators, Review of alternatives considered, etc. were carried out.
- **Secondary Data:** Based on the findings of mapping, online published data such as Census 2011, Socioeconomic Caste Census 2011, Agriculture census, CGWB reports, etc. will be extracted to have secondary baseline socioeconomic data of the affected community and the region.
- **Socioeconomic Census Survey- PAP/PAH:** Socioeconomic consultations were conducted with maximum feasible representative samples based on availability of PAHs (i.e.02 PAHs of the total 201 landowners belonging to Solar site land) were conducted to understand their socioeconomic status, their livelihood dependency on the affected land, occupation, family profile, land holding pattern, utilization of compensation amount, etc. will be collected. As part of the survey, vulnerable people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected were also considered. Draft RLRP was prepared based on consultation made available and data available at the time of site visit. The finalization of the land transactions and TL route alignment shall be will result in updated RLRP including the final status of negotiated (Willing Lessor/ Willing Lessee) land transactions, identified impacts on the vulnerable households, if any.
- **Community Consultations:** To gain a comprehensive understanding on the types and degree of adverse impact created by the project an in-depth consultation with officials of local government, community leaders, and other representatives of the affected population were also conducted as part of the assessment. As part of the consultation, the community dependency on various affected land, awareness level of the on GRM procedures and associated Common property / Natural resources were evaluated.

#### 1.3.1 Desktop Review

AECOM carried out a desk-based review of the information shared by the client prior to site visit mobilization for the RLRP. Project documents were reviewed to have clear understanding of the project activities and associated possible social impacts. The screening process involved a review of applicable regulatory framework for the project and collection and compilation of available secondary baseline data from authentic published sources. Following documents were reviewed as part of the assignment but not limited to:

- Project overview, Power evacuation,
- Total number of private landowners
- Govt. land Details with survey numbers
- NOC obtained by respective Gram Panchayats
- EEPL's Site Level Organogram
- EEPL's unapproved Grievance Redressal Mechanism
- EEPL's unapproved Stakeholder Engagement Framework

#### 1.3.2 Site Reconnaissance Survey

Followed by desktop review, a social expert from AECOM visited the site between 16<sup>th</sup> to 18<sup>th</sup> November 2023. The site team of EEPL and SRS accompanied AECOM personnel during the site visit (henceforth referred as

Survey Team). The site visits included visit to project site area (solar plant site area) to have a visual observation of relevant areas of the project's activities and the upcoming PSS.

In addition, the survey team had consultations with the relevant stakeholders i.e., two (02) private landowners, one (01) squatter on government land, government officials (revenue officials), medical officers, panchayat representatives, farmers, grazers, etc. The site visits also included sample socioeconomic Census Survey of the affected landowners. Of the total 201 landowners, 02<sup>2</sup> landowners were consulted as part of the assessment. List of PAHs consulted is presented in the Appendix-1.

Key activities carried out during the site visit are listed below:

- Briefing with EEPL site representatives
- Site reconnaissance survey of the solar plant site and proposed PSS
- Consultation with the stakeholders such as (02) private landowner, one (01) squatter on government land etc.
- Sample socioeconomic census survey among the two project affected families (PAHs)

## 1.4 Limitations

This report presents the observations made by AECOM's professionals based on the scope of work and agreed approach and methodology with client. The present report was developed to identify the potential 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 social issues or conditions within the limits of the established scope of work as described in the contract between client and AECOM.

The study/ audit / assessments is/ are based on the information and documents received by AECOM, and the site conditions as witnessed by the AECOM team during the time of the inspection. At the time of site visit, the land transactions with respect to solar project site were in initial phase and no lease-deeds were executed. With respect to the TL, EEPL had completed only route survey and clarified that no further land shall be required. Considering the early stage of the project AECOM could carry out consultations with only 02PAHs of the total 201 titleholders belonging to solar site land. 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 had 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 social requirements of the project covered under this study rather than performance of overall entity. The report is based on inputs received during stakeholder consultations and details shared by client. The outcome of this report can change in case this information is changed at any stage.

This report has been prepared by AECOM for the benefit of its client. 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.

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<sup>2</sup> No other private landowners were made available during study. Thus, no further details pertaining to it could be ascertained at this stage.

The environmental and social assessment for client 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.

Certain site-specific limitations to be considered are as follows:

- AECOM could not carry out consultation with other PAHs as they were not informed and made available during AECOM's site visit;
- EEPL site team informed AECOM about identified survey numbers of government land; however it was further added that the identified land could be changed, if any major risk and/or impact on informal land user is identified.

## 2. Project Description

ENREN Energy Private Limited (hereinafter referred to as 'EEPL or 'Client') proposes to develop a 400 MW capacity solar power project (hereinafter referred to as 'Project') at Sayla, Surendranagar, (near Rajkot-Surendranagar Highway), Gujarat and it connect through 220 KV Over Head Transmission lines at Grid sharing solar (GSS) 220 KV bay of Shapar, Gujarat Energy Transmission Corporation Limited (GETCO) Sub-station. Metering point shall be installed at 220 KV switch yard at Shapar sharing solar (SS) of GETCO. The project was proposed to be developed on approx. 1650 Acres of land, including both private and government land. Currently, project is planning and land leasing stage for private land while the government land handover procedure is still in process. EEPL had previously completed the Environmental and Social Impact Assessment (ESIA) study of the 400 MW solar power project in Sayla, Surendranagar, Gujrat-India as per IFC guidelines in August 2023, by M/s AECOM.

**Table 2.1: Key Project Features**

Sr. No.	Description	Details
1.	Plant Location	Spread over villages -Dhedhuki, Ratanpar and Shapar villages in Sayla Tehsil; Surendranagar; Gujarat
2.	Transmission Line	The power generated will be evacuated to the main GSS (Shapar substation), GETCO substations through the dedicated Single Circuit 220kV Transmission line (Length ~ 60 meters).
3.	Right of Way	Reportedly not required

### 2.1 Project Location

As per the information shared by EEPL team during consultation, total of 1,650 Acres of land is required and is under leasing and transfer process in Dhedhuki, Ratanpar and Shapar villages located in Sayla Tehsil of Surendranagar District in Gujarat. The given land comprises of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land.

The transmission line will be connected from the east side of the plant with the 400 kV shaper Getco grid substation (22°28'53.17"N, 71°18'26.10"E). Project site can be accessed from two different locations Rajkot (~60 kms) and Ahmedabad (~160 kms) which are well connected with other parts of the countries, via road, rail, and flights. Project site is connected with Rajkot city which is nearest city to the project through NH 47. Rajkot airport is located approximately 60 kms from project site and is connected with other cities in India like Mumbai, Delhi, Bangalore, Indore, Udaipur, Goa. The project village locations have been depicted in the **Figure 2-1** below.

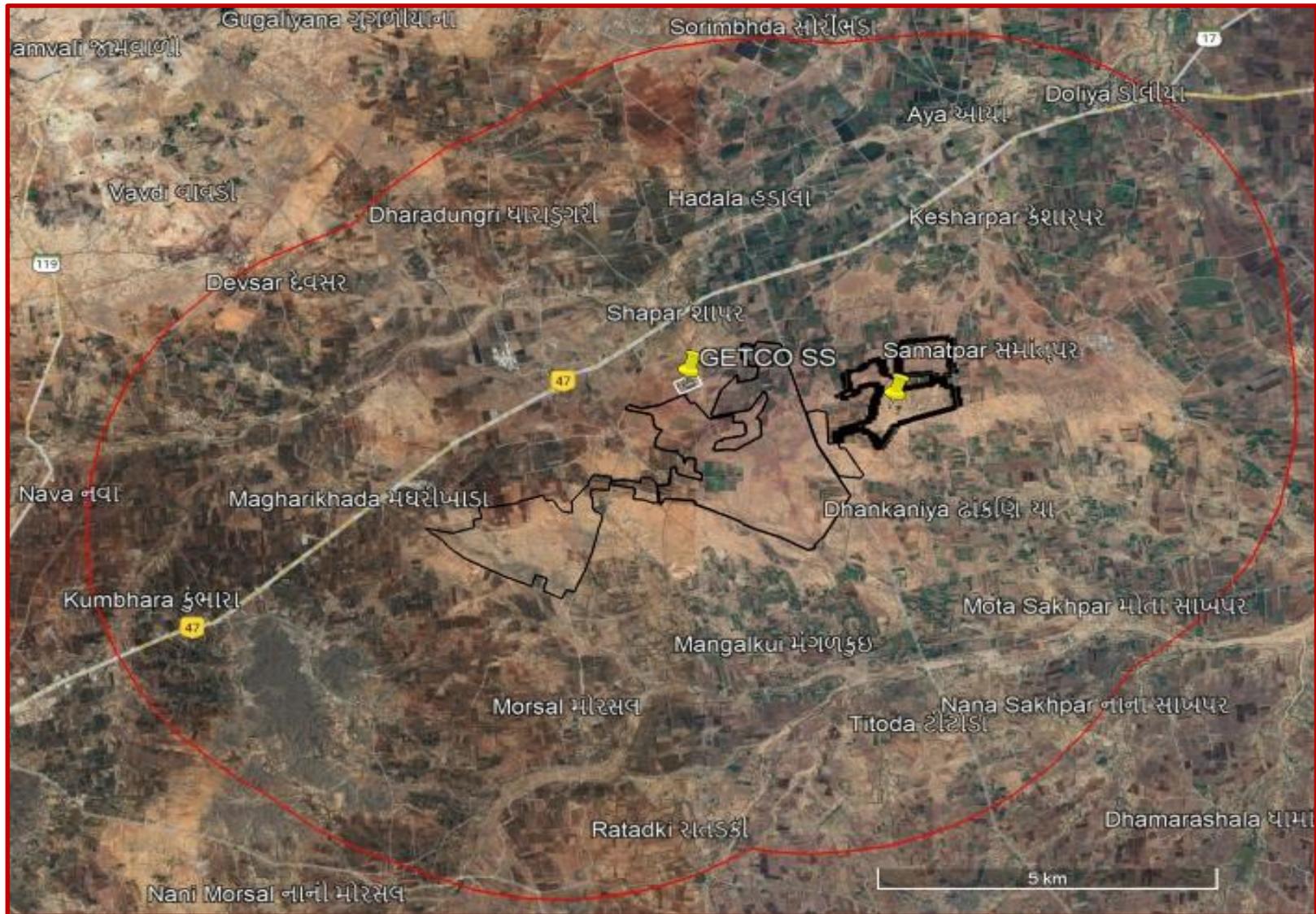


Figure 2-1: Map showing the Study Area villages

## 2.2 Project-Related Land Procurement and Land Procurement Status

### 2.2.1 Land Procurement Status for Solar Park

As per the information shared by EEPL team during consultation, total of 1,650 Acres of land is required and is under leasing and transfer process in Dhedhuki, Ratanpar and Shapar villages located in Sayla Tehsil of Surendranagar District in Gujarat. The given land comprises of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land. The land currently being leased and transferred comprises of given below components:

- For installing solar modules, cables & wires,
- Transformers;
- Main control room (MCR);
- Site office;
- SCADA room and
- 220 kVA switchyard.

Reportedly, out of total 1,650 Acres of land, approximately 992 Acres of private agricultural land is being taken on a long-term lease for 29 years & 11 months from the date of signing lease agreement basis of land lessor's consent and existing market lease rate of land in the area; and remaining 658 Acres of government land shall reportedly be transferred by respective Gram Panchayat and Revenue Department.

The land lessors during consultation reported that the aggregator SRE (reportedly engaged by EEPL basis of legal contract agreement signed in December 2022 for identification of project land, negotiations with private land owners on private land rate, negotiations with govt. bodies regarding govt. land; and further construction of boundary wall) and the land team of EEPL had contacted them in the months of August 2022, further an "Agreement To Lease" was signed between SRE and identified owners between February- September 2023 post mutual negotiations and their consent. Further, a token amount of INR 5000/ Acre was given in advance post signing of MoU. Reportedly, the process of signing lease-deed agreements has started since 18<sup>th</sup> November 2023; the lease-deeds for approx. 285 Acres were carried out at the time of AECOM's site visit and reportedly for the remaining private land it has been executed by 22<sup>nd</sup> December 2023; however, no details pertaining to it were shared with AECOM to validate the same. Reportedly, the ATL has been carried out in the name of SRE; and the Lease-Deed agreements shall be carried out on the name of SPV.

EEPL did not share any details pertaining to land identification process, legal contract agreement signed between EEPL and SRE, copy of ATL signed between SRE & private land lessors with AECOM team for review till the time of report finalization, thus no details pertaining to it has been given in this report.

Further, during consultation with site team and identified private land lessors it was informed that they have willingly given their land on lease for project, basis of mutual negotiations with SRE. The lessors further confirmed that initially a lease amount INR 32,000/ Acre/ Year was offered to them; however, basis of further negotiations a land lease rate of INR 35,000/ Acre/ Year has been finalized. The private land lessors added that they have been primarily dependent on agriculture as their primary livelihood, however, agriculture has not been a profitable livelihood for them from 7-8 years due to low or sporadic rainfall and decrease in productivity. The average income per Acre from agriculture is ~ INR 10,000- 15,000/ Acre; however, the current project is beneficial for them as it offers them a lease value of INR 35,000/ Acre. No sample copies of ATL, Lease-Deed agreements and agreement signed between EEPL and SRE was shared with AECOM till the time of report finalization, thus no further insights regarding these documents have been shared in this report.

Further during site reconnaissance, AECOM identified that 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. also one squatter (*temporary residential structure of an agricultural migrant worker*) and a cattle trough was identified to be located on the government land and one check-dam and shrine located on private land; photo-doc of the same has been given in Figure 2-2 below.

**Figure 2-2 Photo-doc of Informal Usage Of Government Land**

	
<p><i>Photo-doc of a cattle trough identified on Govt. land for common use</i></p>	<p><i>Photo-doc of a temporary residential structure<sup>3</sup> on Survey No. 133 (Govt. land)</i></p>
	
<p><i>Photo-doc of a semi-pucca residential structure on Survey No. 133 (Govt. land)</i></p>	<p><i>Photo-doc of an informal land use for agricultural purposes on Survey No. 133, 135 &amp; 131 (Govt. land)</i></p>
	
<p><i>Photo-doc of a shrine located on Private land</i></p>	<p><i>Photo-doc of a check-dam located on Private land</i></p>

The information pertaining to above-mentioned government survey numbers i.e., Survey No. 131, 133, 135 etc., were verbally shared by EEPL land team. The aggregator team also added that the given above government land parcels and the PSS land parcels were informally used in recent times for agricultural purposes by small farmers; however, no consultations with local community, fence-line private landowners, identified informal users, squatter etc. could be done during AECOM's site visit, hence no further details pertaining to it e.g. number of household members, length of stay of informal land users in the area, pattern of farming, etc. could be ascertained at this stage; however, the above-mentioned consultations shall be carried out at the time of RLRP finalization.

EEPL site team also informed AECOM that the government land parcels have not been finalized and approved by government authorities till date; nearly 310 Acres of government land (under Phase 1) and 348 Acres (under Phase

<sup>3</sup> No consultations with squatters associated with the residential structure could be done due to restrictions imposed by EEPL.

2) have been applied for approvals and in-case of any risks and/or major impacts, i.e., impact of informal land users, impact on graziers etc., if identified on any government land parcel, the same shall be avoided or carved out of project area and in-case it is unavoidable RLRP shall be developed to mitigate the impact.

## 2.2.2 Land & Easement Rights for Transmission Line

### External Transmission Line

The approximate length of the 220 KV external transmission line (evacuating power from the Project's 220 kVA switchyard to existing GPCL's 765/400/220 kVA substation) is ~60 meters. The site team of EEPL informed that one pylon shall be erected within Project land for the 220 kVA external transmission line. No separate easement rights shall be obtained for external TL route as the land between PSS and GSS is the government land, and no private land shall be required for the same. Reportedly EEPL have submitted the route survey to GETCO.

### Internal Transmission Line

The 33 kVA power shall be evacuated through underground cables located within project boundary which shall connect to PSS. No pylons shall be erected as part of internal TL route; thus, no easements rights shall require to be obtained.

EEPL has engaged M/s Shreenathji Electrical for PSS construction work and external TL routing work (i.e., pylon erection, underground laying, stringing work). The PSS construction work was identified to be under progress at the time of AECOM's site visit.

## 2.2.3 Land Requirement and Status for Labour Accommodation

As per the consultation with EEPL team, the construction labours and other casual labours for the construction phase shall be majorly skilled, semi-skilled migrant workers, i.e., Bihar, Odisha Madhya Pradesh etc. Currently 45 contract workers have been engaged through contractor M/s Shreenathji Electricals. The workers were identified to be given a rented accommodation facility in village Chotila; the same was visited by AECOM team during their visit. It was identified that the accommodation facility provided does not have toilet, gated bathroom facility; the workers reported to go for open defecation. Also, the facility was identified to be overcrowded where nearly 15 workers were residing one room.

The site team added that no labour camps shall be constructed during construction phase, the contractors, sub-contractors shall take accommodation facility on rent in nearby villages.

## 2.3 Formal & Informal Usage of Project Land

### 2.3.1 Agricultural Activities

As per site reconnaissance, 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. also one squatter (*temporary residential structure of an agricultural migrant worker*) and a cattle trough was identified to be located on the government land and one check-dam and shrine located on private land.

### 2.3.2 Grazing

Grazing activities were observed within the project area and nearby vicinities. As per community consultations it was understood that more than 50 percent of the total households have livestock.

The local community also added that majority of the Rabari Communities are involved in cattle rearing as primary source of livelihood. Also, the savannas, locally known as *vidis*, are extensively used for livestock grazing, especially during the monsoon season when the open areas are covered by tall and dense grasses. Government-designated pasturelands are reportedly present near the Project Site.

Based on the consultation with the shepherds, revenue officials, and few neighbouring landowners reveals that the proposed project site land does not involve any dedicated "*grazing/ gaucher Land*" and they expressed that there would not be any adverse impact or loss of livelihood due to the proposed project; however, no land records for identified government land were shared with AECOM to validate the same. Impacts on grazing will be ascertained through additional studies/ consultations to be conducted for the finalization of the RLRP.

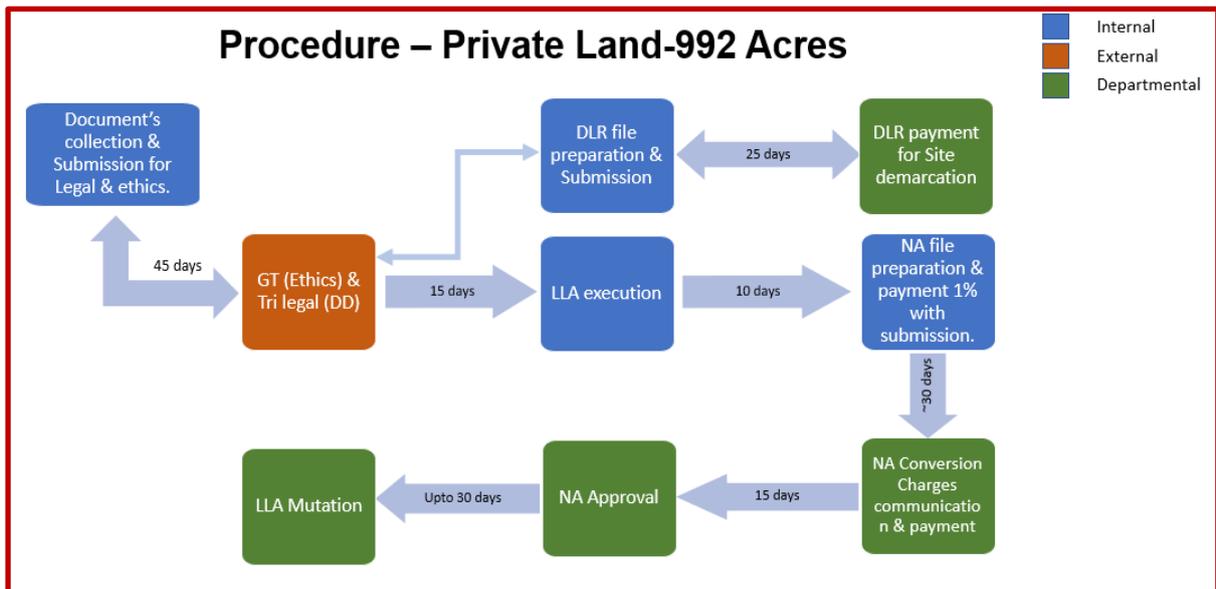
### 2.3.2.1 Key Issues in Land Procurement

As indicated earlier, land required for the proposed project development is being procured from private landowners on a Willing Lessor and Willing Lessee Basis. The position of the project/ land procurement vis-à-vis key socio-economic issues are as follows:

Aspects	Status
<b>Schedule V Area and Tribal Land: Not Applicable</b>	<ul style="list-style-type: none"> <li>As per the review of secondary data the project area does not fall under Schedule V region, also there is no ST population in Project villages, except 04 STs in Shapar village.</li> <li>Reportedly, the land being leased for the project does not belong to any ST household and no livelihood dependence of ST HHs on the project land could be ascertained. Furthermore, no cultural or religious structure belonging to ST community was identified to be located within project footprint.</li> <li>The proposed TL line route does not transverse on any notified tribal land and no land belonging to scheduled tribe is falling within RoW.</li> </ul>
<b>Forest land</b>	No forest land is being involved for the project as well as for the proposed transmission line.
<b>No Objection Certificate (NOC) from Panchayat</b>	As per document review the Project obtained Gram Panchayat NOC from Dhedhukhi and Shapar Gram Panchayats on 12 <sup>th</sup> May 2023.
<b>Landlessness:</b>	<p>As per information total of 1,650 Acres of land is required and is under leasing and transfer process. The given land comprises of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land.</p> <p>As per information the 992 Acres of private land belonging to reportedly 201 landowners which does not involve any ST household and will not lead to landlessness among private landowners; however, the impact of government land allocation could not be ascertained at this stage. The impact of government land transfer, i.e., if it led to landlessness among informal users, shall be ascertained during additional studies/ consultations for finalization of RLRP post government land allocation.</p>
<b>Common Property Resources (CPR)</b>	No common property resources were identified within project boundary
<b>Cultural Heritage sites:</b>	<p>AECOM team during site reconnaissance identified one religious structure i.e., shrine, located on private land within project boundary in village Dhedhukhi.</p> <p>The team further added that consultation with private landowner and local community has been carried out basis of which the identified shrine shall be relocated on the adjacent private land. The structure shall not be demolished; however, no further details pertaining to new location where shrine shall be relocated, owner of the new location, accessibility to new location/ displaced shrine, plans/ steps for relocation of cultural heritage etc. was shared with AECOM; also, no community consultations were carried out to further understand the local community's association with religious structure. Considering the above-mentioned observations and limitations, the facility shall develop a plan for relocation of identified religious structure/ cultural heritage prior to relocation.</p>

### 2.3.3 Land Procurement Process

Land required for the proposed project development is being sourced through private landowners on a Willing Lessor and Willing Lessee basis and does not envisage any physical or economic displacement with respect to the private land. The project site is located adjacent to the GSS and hence the installation of TL towers is not envisaged under the project. The said land does not include any Notified tribal /land belonging to tribal or forest land. The procedure used for procurement of the said land has been highlighted in figure below.



**Figure 2-3: Private Land Leasing Process and Timeline**



**Figure 2-4: Govt. Land Approval Process**

### 2.3.3.1 Role of Land Aggregator

Client had appointed M/s. Systems Renewable Energy as a land aggregator for the proposed project to support in land leasing process and liaisons with various government departments. The key roles of the the Land Aggregator in land leasing process for the proposed project are highlighted below:

- Identify and aggregate the project land suitable for the Project
- Conduct the survey of the project land through a government surveyor and submit soft copy of finalised boundary co-ordinates for engineering purposes (including sub-survey no wise marking)
- Obtain and provide documents related to the title, survey, revenue, marketability in connection with the Project Land and right of way land.
- Obtain the right of way ('ROW') for the properties leading to the substations if applicable

- Co-ordinate in the execution and registration of the conveyance/ lease deed in connection with the Project Land and ROW.
- Obtain No Objection Certificate (NOC) from the respective village panchayats / gram panchayats for the Land Aggregation.
- Liaison with the Government Authorities for obtaining such approvals/ permissions required for setting up of the Project on the Project Land and for transfer of ownership of the Project Land on to the name of the SPVs.
- Supporting Client in obtaining non-agriculture certificate from the district administration
- Executing Agreement to Lease on behalf of Client and supporting Client in executing lease deeds.
- Construction of the approach road in connection the Project Land after obtaining all the necessary Approvals and ensuring all ROW issues / definitive pathway rights in favour of SPVs, if applicable.

### 3. Legislative Review

The following reference framework has been referred to while developing this RLRP Report for the project:

1. ADB Safeguard Policy Statement (SPS), 2009;
2. ADB Social Protection Strategy, 2001;
3. ADB Gender and Development Policy (1998)
4. ADB Access to Information Policy, 2019;
5. World Bank Group/IFC EHS as well as sector specific Guidelines
6. IFC – Handbook for Preparing a Resettlement Action Plan and other relevant good industry practice guidelines and related documents.

The national and state Legislations and Standards that are also applicable for the project include:

1. The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (RFCTLARR), 2013
2. The Child Labour (Prohibition and Regulation) Amendment Act, 2016
3. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
4. Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996 and Rules 1998.
5. All applicable Chief Labour Commissioner Rules & Acts in relation to India.
6. Indian Telegraph Act, 1885, Section 10 and 16
7. Electricity Act, 2003, Section 67, 68 and 164
8. Forest (Conservation) Act, 1980 and Amendment 1988 and Forest (Conservation) Rules, 2003
9. Guidelines issued on “Payments of Compensation towards damages in regard to Right of Way of Transmission line” dated 15<sup>th</sup> October 2015 by Ministry of Power, GOI

#### 3.1 ADB’s Safeguard Policy Statement (SPS), 2009

The ADB’s Safeguard Policy Statement (SPS) 2009 applies to all ADB-supported projects reviewed by ADB’s management after 20<sup>th</sup> January 2010. ADB works with borrowers to put policy principles and requirements into practice through project review and supervision, and capacity development support. The SPS also provides a platform for participation by affected people and other stakeholders in project design and implementation.

ADB’s environmental safeguards aim to ensure the environmental soundness and sustainability of projects, and to support the integration of environmental considerations into the project decision-making process. The Safeguard Policy Statement (SPS) requires borrowers to identify project impacts and assess their significance; examine alternatives; and prepare, implement, and monitor environmental management plans. The SPS requires borrowers to consult people likely to be affected by the project and disclose relevant information in a timely manner and in a form and in languages understandable to those being consulted.

ADB’s involuntary resettlement safeguards aim to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups. Involuntary resettlement safeguards call for meaningful consultation with affected people; compensation of losses and provision of assistance to and benefit sharing with displaced persons, and specific measures for the poor and vulnerable. Involuntary resettlement safeguards also require the preparation, implementation, and monitoring of time-bound resettlement plans.

ADB’s indigenous people’s safeguards aim to ensure that the design and implementation of projects foster full respect for indigenous peoples’ identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the indigenous peoples themselves so that they receive culturally appropriate social and economic

benefits, are not harmed by the projects, and can participate actively in projects that affect them. For a project with impacts on Indigenous peoples, the Safeguard Policy Statement (SPS) requires borrowers to carry out meaningful consultation and to prepare and implement an indigenous people's plan. The plan includes measures to ensure that Indigenous peoples benefit, and that adverse impacts are prevented, or where this is not possible, mitigated. The SPS requires that broad community support of affected Indigenous peoples' communities be ascertained for project activities to which Indigenous peoples are deemed particularly vulnerable.

**Safeguard Requirements 2: Involuntary Resettlement:** The proposed project involves in sourcing of both Private and Government Land. It was reported that private land is to be sourced through executing long term lease agreements on willing lessor and willing lessee basis and government land on basis of allotment from the district administration. Based on the discussion with Client team and site visit observations, few government land parcels were under cultivation by illegal encroachers. Also, one residential structure belonging to a squatter and one cattle trough on government land was identified to fall on government land identified for project. EEPL site team also informed AECOM that the government land parcels have not been finalized and approved by government authorities till date; nearly 310 Acres of government land (under Phase 1) and 348 Acres (under Phase 2) have been applied for approvals and in-case of any risks and/or major impacts, i.e., impact of informal land users, impact on graziers etc., if identified on any government land parcel, the same shall be avoided or carved out of project area and in-case it is unavoidable RLRP shall be developed to mitigate the impact. The given mitigation will however be developed post government land allotment is approved and transferred on project's name by government departments.

**Safeguard Requirements 3: Indigenous Peoples:** The Project area does not fall under Schedule-V areas as defined in the Indian Constitution under Article 342. The land does not comprise of any tribal land/ land parcels owned by members belonging to the Indigenous Peoples (IP) or their dependency on the land for livelihood. Moreover, it is to be noted that there are no Scheduled Tribe population residing within the study area. Hence SPS-3 will not be triggered for the proposed project.

### 3.2 Comparison of Government Regulation with the ADB Safeguard Policy

A comparison between Government Statutes and ADB's involuntary resettlement safeguards policy that depicts the gaps between the national regulation and the ADB policies. The key differences or gaps between national and ADB Safeguard Policy are as follows:

#### **Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (RFCTLARR Act 2013)**

- (i) The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (RFCTLARR Act), which has integrated provisions of National Rehabilitation & Resettlement Policy, 2007 (NRRP) along with LA Act 1894, recognizes titleholders affected by land acquisition, however the squatters, encroachers and those present in Row and other government lands are excluded from the purview of the Act. The rights of informal users, i.e., encroachers, squatters are duly recognized under Section 7 of Safeguard Requirements 2<sup>4</sup>.
- (ii) As per RFCTLARR Act, the cut-off date is the date of SIA notification for the titleholders and for non-titleholders, the affected person should have been living/working continuously for three years or more prior to acquisition of the land, whereas ADB SPS does not prescribe any such conditions for non-titleholders and recognizes them as affected, irrespective of the duration of stay/living/working at the affected land parcel, the cut-off date in this case of ADB is the date of census survey conducted at project. The provisions relating to rehabilitation and resettlement under the Act shall apply in the cases of purchase of land, equal to or more than 2500 acres in rural areas or equal to or more than 1250 acres in urban areas through negotiation<sup>5</sup>. Hence conditions there into RFCTLARR Act will not apply for this project.

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<sup>4</sup> The given RLRP has duly identified the rights of informal land users of government land. The PAPs/ PAHs if any, shall be duly identified during additional study/ consultations for finalization of RLRP.

## Electricity Act 2003 and Telegraphic Act 1885

The Transmission Projects in the country are implemented in accordance with the provisions of the Electricity Act, 2003. The compensation towards "damages" during implementation of such projects is governed by Section 67 & 68 of the Electricity Act read with Section 10 & 16 of the Indian Telegraph Act, 1885. As per the provisions of the Electricity Act 2003 and Telegraph Act (1885), the projects requiring easement rights for laying transmission line will not permanently procure the land under the tower footprints or RoW. Easement rights for the tower and right of way will be procured as per Ministry of Power (MoP) Guidelines for Payment of Compensation Towards damages regarding RoW, October 2015. The guideline suggests 85% value of the land under the tower footprint area and 15% of land value for the land within the RoW. The suggested compensation under the guideline only applies to transmission lines of 66 KV and above, and not for sub-transmission and distribution lines below 66 KV. For the proposed project, the said guideline will not be applicable as the transmission voltage would be 33kV.

Section 10 of Telegraphic Act 1885 allows authority to place and maintain telegraphic lines and shall pay full compensation towards damages sustained during the installation of the telegraphic lines. The provision of the said Act provides that all damages have to be compensated but there is no specific procedure or definition of damages. Considering the lack of local legislation, the client proposes to source the easement rights along the transmission line route through negotiation in line with the requirement of ADB SR2.

### 3.3 Basic Principles for the Project

As part of compliance to ADB's Safeguard Policy Statement (SPS), 2009, following basic principles shall be adopted:

- a) To the extent possible avoid negative impacts associated with the project related land acquisition and involuntary resettlement;
- b) Where negative impacts cannot be avoided, develop plans to assist the PAHs, in improving the living standard or at least regaining their standard of living and income;
- c) Carry out meaningful consultation with affected persons and inform all displaced persons of their entitlements and resettlement option in a transparent manner;
- d) Ensure their participation in planning, implementation and monitoring of the Project;
- e) Disclose all project related information and ensure effective PAHs participation in resettlement's planning and implementation;
- f) Provide compensation for acquired assets at replacement/market value in accordance with this RLRP;
- g) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets;
- h) Provide resettlement assistance for the physically displaced and income restoration to PAHs/PAPs for the economically displaced PAHs / PAPs;
- i) Provide entitlement to PAHs who were present during enumeration on and before the cut-off date. However, anyone moving into the project area after cut-off date will not be entitled to assistance;
- j) Provide compensation and resettlement assistance prior to taking possession of the acquired land and properties;
- k) Establish grievance redressal mechanism to ensure speedy resolution of disputes;
- l) Ensure adequate budgetary support by management to cover implementation costs for RLRP; and
- m) Monitoring (if required) of the implementation of RLRP

## 4. Socio-economic Baseline of Project Affected Villages and Project Affected Households (PAHs)

The proposed solar power plant is proposed to be developed on identified 1650 Acres of land comprising of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land. The approximate length of the 220 KV external transmission line (evacuating power from the Project's 220 kVA switchyard to existing GPCL's 765/400/220 kVA substation) is ~60 meters. The site team of EEPL informed that one pylon shall be erected within Project land for the 220 kVA external transmission line. No separate easement rights shall be obtained for external TL route as the land between PSS and GSS is the government land, and no private land shall be required for the same. Similarly, for internal TL route a 33 kVA power shall be evacuated through underground cables located within project boundary which shall connect to PSS. No pylons shall be erected as part of internal TL route and thus, no easements rights shall require to be obtained.

The required private land for developing the solar power plant is being taken on a long-term lease for 29 years & 11 months from the date of signing lease agreement and the required RoW for the proposed transmission line is to be done as per The Telegraphic Act 1885 and the compensation for the tower footprint along with RoW will be based on the private negotiations and in line with the requirements of the ADB SR-2. As on date of site visit, only the route survey for the transmission line route was completed but exact route alignment was yet to be finalized.

### 4.1 Profile of the Project Villages

The proposed solar power plant is to be developed in the Dhedhuki, Ratanpar and Shapar villages. The Project site is connected with Rajkot city which is nearest city to the project through NH 47. Rajkot airport is located approximately 60 km from project. As per community consultations the Govt. primary schools are located in all project villages and the nearest Higher. Secondary school is located at Dhedhuki Village are accessed to the schools up to Higher Secondary (12<sup>th</sup> Std.) and the nearest higher education facilities such as colleges and skill development institutes are accessible from the nearby towns Surendranagar, Rajkot, etc.

- During consultations with the village representatives and revenue officials it was stated that there is no Primary Health Centre within the project site villages, the nearest Government hospital is at Ukkarakundi Community Health Centre (CHC), with respect to nearest private allopathic hospitals and clinics are present at Manur and Devarkulam villages. And mostly people prefer to go to Government hospital in case of ailment.
- The nearest medical facility to the project site is at Doliya PHC and Community Health Centre at Chotila. The Chotila CHC is the referral hospital for the PHCs under Chotila Tehsil and covering entire taluk and Chotila Town. The facility has 50 bed capacity with emergency services, Maternity care, operation theatre, standby ambulance, and OPD services covering majority of service. The facility also maintains and administer Antivenom, Childhood Immunization. Based on consultation with the health Officer, it was reported that 100% of the childbirth in the tehsil are institutionalized and 100% of the newborn being vaccinated. For major ailments the patients are referred to General Hospital Surendranagar and further private multi-speciality hospitals at Surendranagar and Rajkot. As reported, there are no existing common illness or disease endemic to the region.
- The majority of the population in the study area are engaged in agricultural activities as their main occupation; approximately 80.5% (35.4% Cultivators and 45.1% Agriculture Labours) of the workers from core zone villages and 88.8% (44.6% Cultivators and 44.2% Agriculture Labours) of the buffer zone villages were involved in agriculture activities.
- Overall women's participation in the workforce in the region is less than that of male workforce participation. With respect to the study area, 18.9% for the core zone villages and 42.1% for the buffer zone villages are involved in economic activity. The lowest female workforce participation was observed in Dhedhuki village (1.8%). It was reported during the consultation with the opinion leaders and women groups, generally the people in the region encourages the girl children to pursue higher education and in general the average age for marriage for girl is around 20-22 years. Women are usually reported to be involved in agriculture labour work.
- Within the project site villages Scheduled Caste population are present in Dhedhuki (10.33%) and Shapar (3.34%) Villages and Scheduled Tribe Population are present in Shapar Village (0.33%). Based on consultation with the locals and village representatives it was reported that SC / ST are not socially secluded, and they live along with the mainstream people.

**Table 4.1: Socioeconomic Profile of Project villages**

S. No	Particulars	Dhedhuki	Ratanpar	Shapar
1	<b>Households</b>	193	120	234
2	<b>Population</b>	1036	624	1197
3	Male	542	320	637
4	Female	494	304	560
5	<b>Sex Ratio</b>	911	950	879
6	<b>Children &lt;6 yrs.</b>	195	133	198
7	Male Children	106	66	91
8	Female Children	89	67	107
9	<b>Scheduled Caste</b>	10.33%	0%	3.34%
10	<b>Scheduled Tribes</b>	0%	0%	0.33%
11	<b>Literates</b>	60.4%	56.8%	67.5%
12	Male Literates	70.2%	69.3%	81.0%
13	Female Literates	49.9%	43.5%	51.2%
14	<b>Working Population</b>	27.8%	34.5%	48.5%
15	Cultivators	29.2%	36.7%	37.9%
16	Agriculture Labours	38.9%	59.5%	42.8%
17	Household Workers	0%	0%	0%
18	Other Workers	31.9%	3.7%	19.3%
19	Main Workers	91.3%	100.0%	87.9%

Source: Census 2011



Photo-doc of consultation with private land lessors

## 4.2 Socioeconomic Profile of PAHs

The land take for solar park including PSS was in its initial stage of land identification negotiations. As part of the project AECOM carried out consultations with two (02) identified private landowners out of total 201 private landowners; and one (01) squatter on govt. land parcels.

### Household of Private landowner:

The private landowners further added that the two private land parcels of 326 Acres (reportedly belonging to 04 HHs) and 300 Acres (belonging to 02 HHs) comprises of approximately 68 and 18 PAPs respectively. The identified private landowners belonged to general and OBC community.

Out of the two consulted landowners, private service is the primary source of income of first owner, while the other private landowner informed to have private business (of vehicles) and private job as their primary source of income. The owners were informed to have their household income of more than INR 25 lakh/ year and do not belong to BPL category. In-addition both the private landowners informed to have given this project land on lease to small farmers; reportedly, the land was informally leased and currently the project lands have not been leased. It was further added that the landowners had given this land on lease to 4-5 small farmers from the same village. It was further added that the leasing of land for the project shall not have any adverse livelihood impact on lease holders/

small farmers, as landowners have additional 200 and 150 Acres of land which have/ and shall lease to those small farmers for agricultural purposes. Further details shall be assessed during additional study/ consultations carried out for finalization of RRLRP. The landowners added that they have additional 200 and 150 Acres of private agricultural land remaining with them; moreover, the leasing of land would be more beneficial and fixed source of income.

Both the landowners consulted informed to have 2 four-wheeler vehicles, pucca concrete house (of 4-5 rooms each), with adequate electricity and sanitation facilities. The landowners informed to have livestock which they rear for self-consumption of milk products.

Household of squatter/ informal land user on Govt. land:

During site reconnaissance a migrant family, identified to be residing on government land (identified for project). The identified PAH informed to have migrated from Khambhat District and are staying on the given land for the past two years. The squatted family informed to work as an agricultural labour in the adjacent private land parcel.

The structure of squatted family identified to be a kuccha structure with one pucca toilet facility. The structure had adequate electricity connection and drinking water through well (located on adjacent private landowner's land). No further details pertaining to caste, HH income, PAPs etc. were shared with AECOM team. EEPL shall ensure that the squatters are not affected due to upcoming project; and in-case they are physically displaced, due compensation including resettlement cost is given to them by project.

**Table 4.2: Socioeconomic Survey of PAHs**

S. No	Particulars	Numbers / Value	
1	Number of Landowners	201 (100%)	
2	Number Consulted	02 (01%)	
3	Religion	Hindus	02 (100%)
		Christian	00 (00%)
		Illiterate	00 (00%)
4	Education Level (Head of Family)	Primary (up to 5 <sup>th</sup> Std)	00 (00%)
		Secondary (up to 10 <sup>th</sup> Std)	00 (00%)
		Higher Secondary (up to 12 <sup>th</sup> Std)	00 (00%)
		Graduation and above	02 (100%)
5	Social Group	Gen	01 (50%)
		OBC	01 (50%)
		SC	00 (00%)
6	Income Source	Only Agriculture	00 (00%)
		Agriculture & Cattle Rearing	00 (00%)
		Agriculture & Business	02 (100%)
		Business (Real Estate, Finance, Insurance Agent, etc.)	00 (00%)
7	Annual Income Level	<2 Lakhs	00 (00%)
		2-4Lakhs	00 (00%)
		4-6 Lakhs	00 (00%)
		>6 lakhs	02 (100%)
8	Compensation Utilization	Business	00 (00%)
		Education	00 (00%)
		House Construction	00 (00%)
		Purchased Land	00 (00%)
		Purchased Land and Business	02 (100%)
9	Household Assets	Marriage	00 (00%)
		Pakka House	02 (100%)
		Semi Pakka House	00 (00%)
		Two-Wheeler	02 (100%)
		Four-Wheeler	02 (100%)
10	Vulnerability	Toilet Facility	02 (100%)
		HH Headed by Physically Challenged	00 (00%)
		HH with Physically Challenged Members	00 (00%)

S. No	Particulars	Numbers / Value	
	HH Headed by Elderly > 60	02 (100%)	
	Women Headed HH	00 (00%)	
11	Women Education Level	Illiterate	00 (00%)
		Primary	00 (00%)
		Secondary	00 (00%)
		Hr. Secondary	00 (00%)
		Graduation	02 (100%)
		Post-Graduate	00 (00%)
		Housewife	02 (100%)
12	Women Role in Economic Activity	Private Employed	00 (00%)
		Teacher	00 (00%)
		Beedi Making	00 (00%)

## 5. Land Procurement and Access to Transmission Line RoW

As per information 1,650 Acres of land is required and is under leasing and transfer process in Dhedhuki, Ratanpar and Shapar villages located in Sayla Tehsil of Surendranagar District in Gujarat. The given land comprises of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land.

The private land, i.e., 992 Acres is being taken on a long-term lease for 29 years & 11 months from the date of signing lease agreement basis of land lessor's consent and existing market lease rate of land in the area; and remaining 658 Acres of government land shall reportedly be transferred by respective Gram Panchayat and Revenue Department.

The approximate length of the 220 KV external transmission line (evacuating power from the Project's 220 kVA switchyard to existing GPCL's 765/400/220 kVA substation) is ~60 meters. Reportedly, there are no structures and informal users on the given ~60 meters TL route. One pylon shall be erected within Project land for the 220 kVA external transmission line. No separate easement rights shall be obtained for external TL route as the land between PSS and GSS is the government land, and no private land shall be required for the same. Reportedly EEPL have submitted the route survey to GETCO.

Further, for the internal transmission line, the 33 kVA power shall be evacuated through underground cables located within project boundary which shall connect to PSS. No pylons shall be erected as part of internal TL route; thus, no easements rights shall require to be obtained.

### 5.1 Anticipated Project Impacts

#### Impact on informal users of Govt. land

- During site reconnaissance, AECOM identified that 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. and a cattle trough was identified to be located on the government land. The information pertaining to above-mentioned government survey numbers i.e., Survey No. 131, 133, 135 etc., were verbally shared by EEPL land team and further validated by site team of SRE during site reconnaissance (at the above-mentioned govt. land parcels). The aggregator team also added that the given above government land parcels and the PSS land parcels were recently informally used for agricultural purposes by small farmers. No consultations with identified informal users, squatter etc. could be done during AECOM's site visit.

EEPL site team also informed AECOM that the government land parcels have not been finalized and approved by government authorities till date and in-case of any risks and/or major impacts, i.e., impact of informal land users, impact on graziers etc., identified on any government land parcel, the same shall be avoided or carved out of project area and in-case it is unavoidable a detailed RLRP shall be developed to mitigate the impact.

#### Impact on residential structure

During site reconnaissance AECOM identified one squatter i.e., *temporary residential structure of an agricultural migrant worker* located on identified government land for project. The identified household informed to had migrated from nearby Khambhat district two years ago. The affected household works as a daily wage agricultural labourer on the nearby private land parcels.

The structure identified to get impacted due to project comprised of one (kuccha residential structure), one pucca (toilet) and one cattle shed. The PAPs informed that in-case of physical displacement from the current location they would face challenges in finding new location for settling; moreover, their livelihood shall also get affected due to the displacement.

#### Impact on Private. land

- As per consultation with identified private landowners, the upcoming project shall have positive impact on them. The private land lessors added that they have been primarily dependent on agriculture as their primary livelihood, however, agriculture has not been a profitable livelihood for them from 7-8 years due to low or sporadic rainfall and decrease in productivity. The average income per Acre from agriculture is ~ INR 10,000-15,000/ Acre; however, the current project is beneficial for them as it offers them a lease value of INR 35,000/ Acre;

- Based on the socio-economic survey conducted with 02 private landowners; they have additional 150-200 Acres of private agricultural land left with them. Moreover, the land is being leased thus not leading to lawlessness among any 201 landowners.

Impact on religious structure and associated utilities

- AECOM team also identified the upcoming project shall have impact on one check-dam and shrine located on private land; photo-doc of the same has been given in Figure 2-2 above.

AECOM team also identified underground irrigation pipeline transversing through identified project area. The EEPL team informed that a 2-meter RoW will be left for the irrigation pipeline and a permission from respective “Water Resources Dept.” shall be taken. No further details regarding total length of pipeline, areas & villages benefitted by the irrigation pipeline were shared with AECOM during site visit, the given details shall be ascertained during community consultations carried out for finalization of RLRP.



Photo-doc of identified project area

Photo-doc of existing irrigation pipeline within project area

The details on land requirement for various components in developing the project and the present status of the land procurement process are depicted in the Table 5.1

**Table 5.1 Land Procurement Status**

Project Component	Land Area	Type of Land	Village	Status
Solar Power Plant	~1650 Acres	Private Agriculture Land and Govt. land	Dhedhuki, Ratanpar and Shapar	No lease-deed agreements were carried out for the private land parcels at the time of site visit; and no transfer letter was allotted for the identified government land.
Transmission Line	Route Alignment Survey for internal and external TL route has been done however the final transmission line corridor is to be finalized.	Govt. land	Dhedhuki	As on date only route survey is completed and no “Right to Access” for RoW is required for both internal and external TL route.

## 6. Stakeholder Consultation

As part of Environment and Social Impact Assessment and RLRP, the team of Social Expert, EHS and Ecology and Biodiversity Expert from AECOM along with EHS expert and land aggregator from EEPL had conducted consultation with various stakeholders. The consultation was made with an objective to enhance public understanding on the Project, to map the socioeconomic profile of the PAHs, to create awareness on the GRM procedures among the landowners and village representatives, to understand the community/PAHs perception on the proposed project and to address any issues pertaining to plant and TL RoW. The consultation covering various stakeholders such as PAHs, Government Revenue Officials, School Teachers, Farmers, Cattle Grazers, Livestock Inspector, NREGA<sup>6</sup> Workers, etc. were consulted through focus group discussions (FGD), meetings and individual interviews. These consultations were carried out along with the representatives from EEPL Land Team and Land Aggregators. The opinions of the stakeholders and their perceptions were obtained during these consultations. Socioeconomic consultations were conducted with 02 private landowners and one (01) squatter on government land. The outcome of the key stakeholder consultations and perceptions towards the project are presented below.

- As on the date of site visit (2<sup>nd</sup> June 2023 and 18<sup>th</sup> November 2023), no sale deeds were executed. EEPL and the land aggregators were in process of negotiation with the landowners and review of land records.
- Based on the site observation and information shared by EEPL land team, the private land was used for agricultural purposes and agriculture was mostly dependent on rainwater;
- The land lessors during consultation reported that the aggregator SRE (*reportedly engaged by EEPL basis of legal contract agreement signed in December 2022 for identification of project land, negotiations with private land owners on private land rate, negotiations with govt. bodies regarding govt. land; and further construction of boundary wall*) and the land team of EEPL had contacted them in the months of August 2022, further an “Agreement To Lease” was signed between SRE and identified owners between February- September 2023 post mutual negotiations and their consent;
- The private land lessors informed that they have willingly given their land on lease for project, basis of mutual negotiations with SRE. The lessors further confirmed that initially a lease amount INR 32,000/ Acre/ Year was offered to them; however, basis of further negotiations a land lease rate of INR 35,000/ Acre/ Year has been finalized.
- The private land lessors added that they have been primarily dependent on agriculture as their primary livelihood, however, agriculture has not been a profitable livelihood for them from 7-8 years due to low or sporadic rainfall and decrease in productivity. The average income per Acre from agriculture is ~ INR 10,000- 15,000/ Acre; however, the current project is beneficial for them as it offers them a lease value of INR 35,000/ Acre.
- The proposed project site does not restrict any access road/ revenue roads. However, during reconnaissance survey few footpaths/ cart tracks were observed within the project site land. These cart tracks/ footpaths were reported to be used by the neighbouring landowners and local people as a shorter route to reach their destination. Based on the consultation with herders, landowners there will not be any adverse impact and post project implementation the connecting access road which will be upgraded for the project will be used by the locals for easy movement. As part of SEP, EEPL will disseminate GRM procedures to receive grievances if any in this regard. Also, it was informed by local community and EEPL site team that there is an existing main village road and there shall be no adverse impact on commuting by local community during construction and operational phase; moreover, there are existing alternate access routes connecting the nearby settlements which shall be duly identified and used temporarily basis of consultation between EEPL and local community.
- The information pertaining to the government survey numbers i.e., Survey No. 131, 133, 135 etc., were verbally shared by EEPL land team and further validated by site team of SRE during site reconnaissance (at the above-mentioned govt. land parcels). The aggregator team also added that the given above government land parcels and the PSS land parcels were recently informally used for agricultural purposes by small farmers; however, no consultations with local community, fence-line private landowners, identified informal users, squatter etc. could be done during AECOM’s site visit, hence no further details pertaining to it could be ascertained at this stage.

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<sup>6</sup> Workers under National Rural Employment Guarantee Scheme

- Land Procurement process followed for sourcing the private land were identified to be in compliance with ADB SR2 requirements; however, for the government land i.e., informal users, the compliance could be established post land finalization and/or implementation of RLRP.
- Consultations with sample landowners revealed that meaningful consultation were made with the landowners prior to collection of land documents, project related information were disseminated to the landowners and lease-rate was finalized basis of mutual negotiations.



*Photo-doc of consultation with private landowner*

*Photo-doc of consultation with private landowner*



*Photo-doc of consultation with grazier*



*Photo-doc of consultation with Revenue Officials Dy. Thasildar, Chotila*

**Figure 6.1: Stakeholder Consultation at Site**

## 7. Resettlement and Livelihood Restoration Plan

The consultation with site team and identified private land lessors clearly indicates that the private landowners have willingly given their land on lease for project, basis of mutual negotiations with SRE. The lessors confirmed during consultation with AECOM that initially a lease amount INR 32,000/ Acre/ Year was offered to them; however, basis of further negotiations a land lease rate of INR 35,000/ Acre/ Year has been finalized. The private land leasing has been in compliance with the ADB SR2 and considering the land is being leased for the project it would not lead to any landlessness among owners. Moreover, the sample private landowners added that they have additional 150-200 Acres of land left with them for agriculture. AECOM understands that the same size of private landowners consulted are very few. Other private landowners shall be duly consulted during additional study/ consultation carried out for finalization of RLRP.

Further, based on the review of satellite imagery and further validation during site reconnaissance, AECOM identified that 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. also one squatter (*temporary residential structure of an agricultural migrant worker*) and a cattle trough was identified to be located on the government land and one check-dam and shrine located on private land; photo-doc of the same has been given in Figure 2-2 above.

AECOM understands that there has been certain livelihood dependency on identified government land by informal users. The government land parcels were identified to use for agricultural activities during seasons and was also used for grazing of livestock; however, the impact of it on each household could not be ascertained at this stage, as the government land has not been finalized till date and no informal users have been identified for the same. The given below entitlement matrix shall be applicable on informal users, in-case the identified government land is finalized and transferred on the name of project.

### 7.1 Screening of Project based Resettlement Impacts (Solar Site)<sup>7</sup>

**Table 7.1 Land and Natural Resources Based Impacts**

Features	Description
Schedule V Area	Not Applicable The Project Area does not fall under the notified Schedule V area. Moreover, there are no presence of any Tribal population within the project villages
Forest Land	Not Applicable As reported by EEPL and the revenue officials, the proposed project site land does not include any forest land.
Tribal (Schedule Tribe) Land / Indigenous People (IP) Land	Not Applicable The land identified for the project does not comprise of any tribal land/ land parcels owned by members belonging to the Indigenous Peoples (IP). Moreover, the project does not have any impacts on IPs. As mentioned earlier, there are no Scheduled Tribe population residing within the project village.
Landlessness	Not Applicable As per information total total of 1,650 Acres of land is required and is under leasing and transfer process. The given land comprises of approximately 992 Acres of private land belonging to reportedly 201 landowners and remaining 658 Acres of government land. As per information the 992 Acres of private land is being leased for the project it would not lead to any landlessness among owners. Moreover, the sample private landowners added that they have additional 150-200 Acres of land left with them for agriculture.
Loss of Cropping Land	Applicable  Private land: The private land lessors during consultation informed that the given land was being used for agriculture purposes and they given the land on lease to small farmers. They further added that they additional 150-200 Acres of land and the leasing of land would not lead to any loss of agricultural land and income for them. Rather leasing of land will be beneficial as it will serve as a fixed source of income for them without selling their land.
Encumbrance on Land/ Economic Impact	Govt. Land: During site reconnaissance, AECOM identified that 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. also one squatter ( <i>temporary residential structure of an agricultural migrant worker</i> ) and a cattle trough was identified to be located on the government land.

<sup>7</sup> This is based on preliminary understanding of the ROW identified during this assessment.

Features	Description
	The information pertaining to above-mentioned government survey numbers i.e., Survey No. 131, 133, 135 etc., were verbally shared by EEPL land team and further validated by site team of SRE during site reconnaissance (at the above-mentioned govt. land parcels). The aggregator team also added that the given above government land parcels and the PSS land parcels were recently informally used for agricultural purposes by small farmers. AECOM understands that in-case the identified government land is taken for the project it will lead to adverse economic impact on informal users, i.e., encroachers, squatters etc. The govt. land has not been finalized till date and thus the total dependents on the govt. land could not be established at this stage. The revenue department officials were consulted during ESIA phase by AECOM; however, no details pertaining to it were shared during consultation.
Physical Displacement	Applicable As per the review of satellite imagery and further validation during site reconnaissance, AECOM identified one squatter ( <i>temporary residential structure of an agricultural migrant worker</i> ) located on the government land; photo-doc of the same has been given in Figure 2-2 above. In-case the identified government land is transferred for the project, it will lead to physical displacement of the identified migrant household.
Economic Displacement	Applicable The proposed solar power plant site comprises of both govt. and private land. The private land will be taken on long term lease basis of Willing lessor and Willing lessee negotiations. The lease rate will be as per the existing market rate.  AECOM identified that 2-3 government land parcels reportedly earmarked for project was/ is used for growing agricultural crops, i.e., wheat etc. As per community consultations and site reconnaissance it is understood that the given land has been used by informal users, small farmers for agricultural purposes. The upcoming project would lead to adverse impact on these informal users as there will be reduction of available area for agriculture, thus leading to economic and financial impact on household. The total informal users of the identified govt. land were not identified during AECOM's site visit, thus census survey with informal users could not be carried out; hence the adverse economic impact on informal users could not be ascertained at this stage.
Land expropriation-Solar Plant Site	Not Applicable The private land for the proposed solar power plant site land is being taken on lease basis of private negotiation on Willing Lessor and Willing Lessee Basis. The agreed lease rates are as per the existing marker rate; while the identified govt. land shall be transferred on the name of project post concerned govt. approval. No land is being expropriate for the project; however, the govt. land take may have an impact over informal users.

## 7.2 Scope and Principles

PAHs are entitled for compensation for the loss or impacts which arises due to the development of project which includes damages to crops / trees, structures, etc. for transmission line only or those using land in the main site who are losing crops or access to livelihood activities (which also constitutes involuntary economic displacement). The latter risk appears to be absent from this site. PAHs are entitled to receive compensation as per entitlement matrix for actual damages or losses irrespective of their gender, religion and their economic status. Additional, consideration to be provided to women and minor – if any of the land parcel belongs to women landowner, market-based compensation shall be paid to the actual women owner of the land, not to their male counterparts. Moreover, if any land parcel belongs to minor (under 18), compensation to the right legal guardian shall be paid as per applicable Indian law.

## 7.3 Eligibility and Entitlements

The following impacts which may arise during the course of project execution will be considered for compensation as per the entitlement matrix.

- a. Loss of structure (non-residential) with or without formal rights on land
- b. Economic displacement
- c. Loss of livelihood with and without formal rights on land
- d. Damage of standing crops and trees
- e. Loss of Agriculture equipment / Borewells / Irrigation Pipelines, etc.
- f. Loss of assets by the informal users of the land
- g. Loss of access and crops by the informal land users on the project site land
- h. Project induced vulnerability due to sale of land
- i. Damage of standing crops, utilities, trees etc. and other temporary project impacts if any during construction phase due to associated project activities.

## 7.4 Categories of Entitlements

Based on the kind of impacts identified, the following entitlement categories has been established

- Cash compensation for the loss of assets which includes land, structures, etc.
- Subsistence allowance in the form of monetary support if income loss due the project development is reported.
- Other livelihood restoration/ enhancement support given by project for both formal and informal land users.

## 7.5 Entitlement Matrix

The below entitlement matrix details about the illustrates the various entitlements for different types of impacts. The various impacts as highlighted in the table will be determined only after completion of all land transactions.

Type / Nature of Impact	Eligibility Criteria	Number of Affected	Entitlement Options	Remarks
Loss of Residential Structure	PAHs who own and use residential structures	Identified one (01) squatter on govt. land	<ul style="list-style-type: none"> <li>Cash compensation at the value of replacement cost including resettlement/ relocation cost and other R&amp;R benefits as per RFCTLARR 2013 Act. Shall be determined by the Chartered Engineer / Revenue officials.</li> </ul>	The project will encourage the household to recover any salvageable material from the existing structures or immovable assets.
Impact due to obtaining easement right of the TL's RoW <sup>8</sup>	Landowner and non-title holders who use the land for cultivation or owns assets / trees	Right to Access for ~60 meters of RoW will be obtained as part of external TL route	<ul style="list-style-type: none"> <li>Crop / Tree loss during stringing will be issued based on the yield loss as per the guidelines issued by the local horticulture / agriculture department / Revenue Department / based on the negotiation with the landowners.</li> <li>Loss of any physical structures if any to be compensated at replacement cost which shall be determined by the Chartered Engineer / Revenue officials / based on the negotiation. EEPL to ensure the compensation value is equal to replacing the similar structure in current date.</li> <li>EEPL to ensure that the compensation amount is equal at replacement value through consultation with PAPs.</li> </ul>	The design and survey for installation of towers shall be made to ensure minimum restriction to enhance the use of the land by the landowner.
Impact on religious structure/ shrine on private land	PAHs on whose land the shrine is located	One (01) Pvt landowner and other local communities who are religiously associated with the shrine. (exact number could not be finalized)	Cash compensation at the value of replacement cost. Shall be determined by the Chartered Engineer / Revenue officials. <i>(Other benefits agreed by EEPL during mutual agreement with owner and local community)</i>	EEPL will ensure that consent of local community and private landowner is obtained
Standing Crops / Trees on both Pvt. and Govt. land	Landowners / Non-titleholders who involved in cultivation on identified Project area	Govt. land has not yet been finalized. The number of affected PAHs is yet to be arrived.	Cash compensation equivalent to the yield value / market value as determined by the horticulture / forest department. EEPL to ensure that the compensation amount is equal at replacement value through consultation with PAPs.	The project shall try taking custody of land during off-season/ dry season.

In addition to the PAHs specific entitlements / compensation, EEPL in general will consider, on need and impact redress basis, implementing the following programs to ensure no land affected PAH is worse off<sup>9</sup>.

<sup>8</sup> Reportedly, there are no informal users and structures within 60 meters TL route; however, no community consultations could be done to validate the same. AECOM has shared the entitlement matrix for TL RoW so that it could be referred in-case of any informal user, structure is identified during additional study. In-case of no informal user, structure etc. the same shall be removed during finalizing the RLRP.

<sup>9</sup> Further studies/ assessment/ consultation will be conducted to ascertain the needs of the PAH, basis of which the RLRP shall be finalized.

- a) Additional care shall be given to the one (01) squatter PAH identified on Govt. land, whose residential structure would get affected due to project.
- b) Skill development training programme for livelihood restoration and income generation opportunities for the project affected household.
- c) EEPL will give preference for livelihood / employment opportunities in solar power project.
- d) EEPL will support enrolment of the willing aspirants in skill development programs thereby generating local skilled workforce.
- e) EEPL to ensure gender consideration in all transactions related to project activities, such as payment of compensation, consultation, management of impacts, project benefits, etc.
- f) Ensure that the process of land acquisition and resettlement does not disadvantage women.
- g) Compensation for the female title holders and / or asset owners to be paid directly to them and not on their behalf to their spouses or any blood relations.
- h) Engage willing and eligible affected persons (skilled/unskilled) in the project construction and operation phases
- i) EEPL will conduct vocational training programs for women workers.
- j) Financial Management Training Programme (FMTP): Money Management Training sessions will be provided for PAPs. It will be designed to help impacted persons utilise compensation payments appropriately in support of sustainable livelihoods.
- k) Strategic cash management training and advisory support services will be provided to all PAPs. Investment experts will be invited to speak to all PAPs about the various investment and interest-bearing instruments available for them to consider.
- l) Awareness & training sessions on project specific Grievance Redressal Mechanism (GRM)

The above Entitlement matrix along with the activities listed above will be further revised, and specific details of entitlements and training activities will be finalized upon completion of identification of affected persons and conduct of participatory assessment and planning.

## 8. Grievance Redressal Mechanism

EEPL had developed a detailed GRM framework which covers both internal and external grievances and EEPL also developed the site-specific Community GRM to receive, evaluate and facilitate the resolution of affected people's concerns, complaints and grievances related to social performance of the project, more specifically related to compensations, privileges and livelihood support activities as applicable. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social concerns linked to the project. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate and facilitate the resolution of affected people's concerns, complaints and grievances related to social performance of the project, more specifically related to compensations, privileges and livelihood support activities – if applicable. The project specific GRM will be shared and discussed with relevant stakeholders, as their feedback will be accounted for finalisation & implementation of robust GRM. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social concerns linked to the project. The project specific GRM is proportional to the risks and impacts of the project and as such, is not intended to bypass the government's own redressal process, rather it is intended to address affected people's concerns and complaints promptly, making it readily accessible to all segments of the affected people. The GRM does not impede access to the country's judicial or administrative remedies. The GRM will continue to function, for the benefit of the affected persons, throughout project lifecycle.

### 8.1 Steps For Grievance Redressal

**Step 1: Filing of grievance** – Grievances, including those filed anonymously can be submitted to the Project through the following channels:

- Grievance boxes located in the village office and at the project site office near security cabin/entry gate.
- Via telephone hotline (Mobile Numbers of grievance officers will be published on GRM Posters)
- Directly to any member (Grievance Officer) of the Grievance Redressal Committee (GRC)<sup>10</sup>
- E-mail to [grievance@engie.com](mailto:grievance@engie.com)

**Step 2: Recording of grievances:** All grievances received will be recorded immediately in the project grievance register. Grievances related to the project but submitted directly to the village office will also be considered and captured into the project grievance register. Grievance boxes will be checked weekly by members of the GRC and there will be weekly coordination with the village head to see if there are any complaints regarding the project. Grievances received via phone and those directly received by GRC members will be immediately recorded.

**Step 3: Acknowledgement of the grievance** – Within three working days upon receipt of the grievance, the GRC will contact the grievance sender to acknowledge receipt of the grievance and provide information on the proposed steps to resolve the grievance, including timelines.

**Step 4: Consultation and investigation** - The GRC will conduct consultation and investigation activities to determine the merits and extent of the grievance and will be completed maximum within 30 days upon receipt of the grievance. Additionally, the grievances that require immediate action/ or with high sensitivity shall be resolved immediately, maximum within one (1) working week. The grievance sender will be interviewed to get additional information about the complaint. The GRC will conduct ocular inspections and interview relevant stakeholders. If needed, coordination with village officials will be done to facilitate resolution of the grievance. Available documents necessary for the investigation will also be reviewed. All information gathered will be properly documented. Step 5: Resolution and feedback - All efforts shall be made to provide redress on the complaints within 45 days from receipt of the grievance. The GRC will work closely with the grievance sender to reach an agreement on a mutually acceptable solution. Where mediation is desired, local institutions will be requested to mediate between the project and grievance sender and other concerned stakeholders. Agreed resolution will be provided in writing to the grievance sender within the prescribed duration. For anonymous grievances, responses will be posted at the project site bulletin board and at the village office.

**Step 6: Appeal or elevation of grievance** - In case complainant/appellant is not satisfied with the decision of project level GRC they can make an appeal to corporate GRC for review. The outcome of the GRC process is binding, unless vacated by the court of law.

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<sup>10</sup> EEPL does not have a documented approved GRM. Also, no standing committee including Grievance Officer was identified to be formed during AECOM's site visit.

**Step 7: Follow-up activities** – Monitoring activities based on the agreed resolution will be conducted to ensure that all committed actions are carried out, and that no remaining issues are unsettled. Grievance senders will be asked for their feedback on the resolution upon completion of agreed actions.

**Step 8: Documentation and reporting** – All actions taken and agreed upon resolution will be recorded in the grievance register. This will include observations and actions during follow-up activities. The GRC will be responsible for preparing regular reports to be submitted to the corporate level and to ADB. The report will include the resolution and closure process.

## **8.2 Structure Of Grievance Redressal Committee (GRC)**

Implementation arrangements at the site level – The GRC will be composed of the Open Access/Social Manager, Regional ESG Manager, Site EHS Manager, Construction Manager and Site E&S Expert (EHS Manager). The Open Access/Social Manager will head the GRC, and the Site E&S Expert will be in-charge of the grievance register, conduct monitoring activities, and prepare grievance reports. During project preparation, information regarding the formation and functioning of project level GRC will be disclosed as part of the public consultation process. Villagers will be provided with handouts with key information on the GRM, including important numbers that they can access. GRM posters with contact numbers will be put in prominent places such as village halls, construction site and other places where stakeholders gather.

## 9. Information Disclosure and Public Consultation

EEPL has developed a Stakeholder Engagement Framework. This engagement framework is focussed on the engagement during the construction and operation phases of the project. The project related information is disclosed to the local panchayat and the project proponent had conducted consultations with the landowners, revenue officials and with other key stakeholders to disclose the proposed project in their respective village and to get consent from the landowners for initiating the land procurement process, etc. Though the project proponent had made various activities related to project disclosure and stakeholder engagement activities, the project specific Stakeholder Engagement Plan in line with the Stakeholder Engagement Framework is yet to be prepared and implemented at site level. Post completion of land transactions and obtaining easement rights for developing the Transmission line, EEPL will consult with the PAPs to identify any project induced vulnerability and accordingly will update the RLRP report. As part of the stakeholder engagement activity the final RLRP with entitlement, list of PAPs, etc. shall be disclosed to PAP and local community the as part of SEP. Final status of the RLRP implementation shall be communicated to ADB through closeout report.

The date of meeting with different stakeholders consulted by EEPL in study area village is provided below.

**Table 9.1: Record of consultations carried out by EEPL with Different Stakeholders**

Sr. No.	Stakeholder Group	Location	Month/Year	Means of communication	Stakeholder Response	Further Action Proposed by EEPL
1	Landowners	Dhedhukhi	Aug 2022- April 2023	In person	Mutual agreement on leasing their land	ATL to be signed
2	Landowners	Ratanpar	Aug 2022- April 2023	In person	Mutual agreement on leasing their land	ATL to be signed
3	Landowners	Shapar	Aug 2022- April 2023	In person	Mutual agreement on leasing their land	ATL to be signed
4	SRE/ Aggregator	-	Dec 2022	In person	MoU signed between both the parties	Finalization of Lease-Deed agreements for Pvt land and transfer of Govt. land
5	Landowners	Dhedhukhi	Feb 2023 - Sep 2023	In person	ATL signed basis of negotiation	Lease-Deed to be signed
6	Landowners	Ratanpar	Feb 2023 - Sep 2023	In person	ATL signed basis of negotiation	Lease-Deed to be signed
7	Landowners	Shapar	Feb 2023 - Sep 2023	In person	ATL signed basis of negotiation	Lease-Deed to be signed
8	AECOM	Dhedhukhi	31-05-2023	In person	Landowners Consultation	Meeting Completed
9	AECOM	Chotila	31-05-2023	In person	Agreegator Consultation	Meeting Completed
10	GETCO		11-04-2023	Virtual/ Document	Signed Grid connectivity Agreement	Signed Grid connectivity Agreement
11	Sarpanch/ Gram Panchayat	Dhedhukhi	12-05-2023	In person	NOC Granted	Final approval from DC for Govt. land
12	Sarpanch/ Gram Panchayat	Shapar	12-05-2023	In person	NOC Granted	Final approval from DC for Govt. land

Source: Data Room and information shared during EEPL site team

Note: the information given above covers only those details which were shared with AECOM team

## 9.1 Budgetary Allocation

The budget allocation to include compensation towards various impacts cannot be determined at this stage. The land negotiations are currently in progress. EEPL shall provide and is committed to provide sufficient budget for implementation of this RLRP. In addition, EEPL will implement various community development programs as part of the corporate CSR budget. Based on the need survey conducted, specific projects/interventions will be identified with the community and implemented.

## 9.2 Institutional Arrangement for Implementation of Interventions

EEPL will be responsible for the overall execution of the RLRP. EEPL can engage third party for monitoring of RLRP implementation, if required. The Project Manager of EEPL at the site will be responsible for ensuring implementation of RLRP including coordination with relevant stakeholders (especially representatives of Local groups/ organizations, community level officials, Gram Panchayat, Open Access & ESG Team), making available required budgets, appointment and facilitating services of specialists for undertaking RLRP activities. With a view to further improve the RLRP implementation capacities of EEPL, team will undergo an orientation and training in livelihoods management at the beginning of the project. The capacity development training inputs would include ADB resettlement policy and principles. The training activities will focus on issues concerning – principles and procedures of livelihoods restoration; public consultation and participation; entitlements and compensation disbursement mechanisms; grievance redressal; and monitoring of resettlement operation. The training would specifically focus on the differences between provisions of ADB policy and applicable Indian laws. The awareness of these differences and the need to follow the provisions of the ADB policy are critical for successful implementation of this RLRP. This training will be carried out by the ESG Team of EEPL.

If in case IR is triggered, baseline information will be gathered & compared by the EEPL to confirm if the livelihood restoration activities were able to restore or improve the condition of the affected Households (HHs). Implementation schedule will be amended as and when the interventions get triggered, in final RLRP.

## 9.3 Monitoring and Reporting

Monitoring will be the responsibility of EEPL. EEPL can take support of the third-party agency for the same. EEPL will prepare semi-annual monitoring reports on their safeguards implementation performance and submit the reports to ADB for information and disclosure. An assessment will be conducted upon completion of RLRP activities to determine if economically affected persons have their livelihoods restored to pre-existing conditions.

The baseline for livelihoods will be set once the government land transfer is finalized and the socioeconomic study is done at HHs level for informal users affected by the govt. land transfer. This will set the baseline, adjusted for inflation, for tracking success of compensatory and RLRP measures, with Monitoring & Evaluation done annually to assess progress until baseline levels reattained or exceeded.

## Appendix A Participant List of Stakeholder Consultations

Sl. No	Stakeholder Type	Name & Address	Date of Consultation
<b>Stakeholder consultations carried out during ESIA</b>			
1.	Client Representative	Manmohan Gite- HSE (Construction), Quality, ESG	30 <sup>th</sup> May 2023
2.	Land Aggregator	System Renewable Energy Limited	31 <sup>st</sup> May 2023
3.	Agriculture Labour	Mr. Kalubhai, Dhedhuki Village	30 <sup>th</sup> May 2023
4.	Landowner	Mr. Gopal Shah and Mr. Vipul Shah	30 <sup>th</sup> May 2023
5.	Landowner	Mr. Joru Bhai Bhimbhai	30 <sup>th</sup> May 2023
6.	Revenue Officials	Mr. Y. P Rana, Dy. Mamaldar (Dy. Tahsildar)	31 <sup>st</sup> May 2023
7.	Village Representative	Mr. Dinesh, Panchada Gaun, Chotila	31 <sup>st</sup> May 2023
8.	Medical Officer	Dr. Methlo Koniya MBBS	31 <sup>st</sup> May 2023
<b>Stakeholder consultations carried out during ESDD</b>			
9.	Land Aggregator	Mr. Saif Makwana from System Renewable Energy Limited	17 <sup>th</sup> November 2023
10.	Private landowner	Mr. Joru Bhai, Dhedhukhi village	17 <sup>th</sup> November 2023
11.	Private landowner	Mr. Giriraj Singh, Dhedhukhi village	17 <sup>th</sup> November 2023
12.	EEPL Site team	Mr. Manoj Yada, Site Head, Construction	17 <sup>th</sup> November 2023
13.	Contract staff & workers	Mr Maqbool and Mr. Badal; PSS Construction work	18 <sup>th</sup> November 2023
14.	Security Guards	Mr Govind and Mr Manga; Site Office	18 <sup>th</sup> November 2023

