

Environmental and Social Compliance Audit Report

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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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DRAFT REPORT

AECOM

**Environmental and Social
Compliance Audit report
for 400 MW Solar Power
plant in Surendranagar,
Gujarat, India**

ENREN Energy Private Limited

5 February 2024

Quality information

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List of Abbreviations

S. No.	Abbreviation	Extension
1.	AAQ	Ambient Air Quality
2.	ADB	Asian Development Bank
3.	AECOM	AECOM India Private Limited
4.	CETP	Common Effluent Treatment Plant
5.	CGWA	Central Ground Water Authority
6.	CPCB	Central Pollution Control Board
7.	CR	Critically Endangered
8.	CSR	Corporate Social Responsibility
9.	CTE	Consent to Establish
10.	CTO	Consent to Operate
11.	DG	Diesel Generator
12.	EHS	Environment, Health and Safety
13.	EHSS	Environment, Health, Safety and Security
14.	ESCAP	Environmental and Social Corrective Action Plan
15.	ESDD	Environment, Social Due-Diligence
16.	ESGDD	Environment, Social and Governance Due Diligence
17.	EC	Environmental Clearance
18.	EPA	Environment (Protection) Act, 1986
19.	EPC	Engineering, Procurement and Construction
20.	ERT	Emergency Response Team
21.	EMP	Environment Management Plan
22.	ESMS	Environment and Social Management System
23.	ETP	Effluent Treatment Plant
24.	GHG	Green House Gases
25.	FI	Financial Intermediary
26.	GRC	Grievance Redressal Committee
27.	GRM	Grievance Redress Mechanism
28.	HCL	Hydrochloric Acid
29.	HIRA	Hazard Identification and Risk Assessment
30.	HR	Human Resources
31.	IFC	International Finance Corporation
32.	IMS	Intergrated Management System
33.	IP	Indigenous People
34.	IUCN	International Union for Nature and Natural Resources
35.	KLD	Kilo litres per day
36.	kg	Kilogram
37.	km	Kilometre
38.	KSPCB	Karnataka State Pollution Control Board
39.	LC	Least Concerned
40.	LOTO	Lock-Out Tag-Out
41.	MDB	1,2-Methylenedioxybenzene
42.	MIDC	Maharashtra Industrial Development Corporation
43.	MoEF&CC	Ministry of Environment, Forest and Climate Change
44.	MSDS	Material Safety Data Sheet
45.	NOC	No Objection Certificate
46.	NOx	Oxides of Nitrogen
47.	PESO	Petroleum and Explosives Safety Organization
48.	PPE	Personal Protective Equipment
49.	PS	Performance Standard
50.	SEIAA	State Level Environmental Impact Assessment Authority
51.	SC	Scheduled Caste
52.	SPCB	State Pollution Control Board

S. No.	Abbreviation	Extension
53.	ST	Scheduled Tribe
54.	STP	Sewage Treatment Plant
55.	TDS	Total Dissolved Solids
56.	ToR	Terms of Reference
57.	TPA	Tonnes per Annum
58.	QSHE	Quality, Safety, Health and Environment

1 Introduction

1.1 Project Background

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') in Sayla, Surendranagar, near the Rajkot-Surendranagar Highway in Gujarat. The Project will be connected via 220 KV Transmission Lines to the Grid Sharing Solar (GSS) 220 KV bay at the Shapar sub-station of Gujarat Energy Transmission Corporation Limited (GETCO). Transmission line which is less than 70 metres from the grid substation was known to be completely underground. The metering point will be installed at the 220 KV switchyard located at GETCO's Shapar Sharing Solar (SS) facility.

EEPL had previously completed the Environmental and Social Impact Assessment (ESIA) study of the 400 MW solar power project as per IFC guidelines in August 2023, by M/s AECOM.

EEPL has engaged AECOM India Pvt. Ltd. ((hereinafter referred to as AECOM) to conduct an Environment and Social Compliance Audit (ESCA) for the abovementioned 400 MW solar power project.

1.2 Scope of work

The scope of work for the current assignment includes the following:

- to determine whether E&S actions were and are in accordance with ADB's safeguard principles and requirements and national legislations, and
- identify and plan appropriate measures to address outstanding issues, legal and non-legal claims, and legacy issues. Where noncompliance is identified, a Corrective Action Plan (CAP) will be prepared. Where legacy issues remain, these will be identified and recommended courses of action to close/resolve provided.
- Preparation of a CAP that will address any issues identified during the audit by specifying time- bound actions to achieve and maintain compliance with the objectives, principles, and requirements of SPS and other environmental and social requirements and national legal requirements.

1.3 Reference framework

The assignment has been conducted in accordance with the following reference framework:

- ADB Safeguard Policy Statement (SPS), 2009
- ADB's Social Protection Strategy, 2001
- ADB Access to Information Policy, 2019
- ADB's Gender and Development Policy, 1998
- International Covenant on Economic, Cultural and Social Rights and relevant ILO Core Labour Standards Conventions
- The World Bank Group General Environmental, Health and Safety Guidelines (2007);
- Other relevant good industry practice guidelines and related documents
- Applicable local, national, and international laws and regulations

1.4 Approach and Methodology

1.4.1 Project Inception and Planning

AECOM organised a kick-off meeting with the client over a teleconference to confirm the scope of work, approach to due diligence, expectations from the required documentation, and timelines of assessment and report submission.

1.4.2 Documentation Review

1.4.3 Site Visit

A team of three (03) professionals - Environmental, Social, and biodiversity - from AECOM carried out the site assessment and undertook the stakeholder consultations on the 17-18 November 2023.

1.5 Limitations / Disclaimer

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

The assessments 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. Since the project was in the initial phase of negotiations and the land leasing process, during the site visit only a limited number of consultations with landowners and village representatives were made possible by the client. As with any assessment exercise, there is a certain degree of dependence upon verbal information provided by the point of contact for assessment, a 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 site assessment, AECOM has attempted to independently assess the potential presence of such conditions within the limits of the established scope of work as described in the proposal. However, verification of potentially important facts is not always possible. AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by site representative at the time this assessment was performed. The assessment is based on sample site visits carried out by AECOM. This report is to be used to understand the overall E&S requirements of the project covered under this study rather than the performance of the overall entity.

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.

The environmental and social assessment for the 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 in 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.

2 Project Overview and Description

The project overview and salient features of the under-construction 400 MW solar project is provided in the table below:

Table 2-1: Key Salient Features of Assets Visited By AECOM

Aspects	Details
Location	400 MW AC project with Single-axis tracker. The proposed project site is located at Sayla, Surendranagar, (near Rajkot-Surendranagar Highway), Gujarat, India. Spread over villages -Dhedhuki, Ratanpar and Shapar villages in Sayla Tehsil
SPV name	ENREN Energy Private Limited (hereinafter referred as EEPL)
Project Status	EEPL is processing the government land handover. Foundation work has started for the main control room and completed 47 nos foundations. Site fencing is in progress. Vegetation clearance is in progress on the land parcels for which ATL and/or Lease-Deed has been carried out The project site office setup in progress. No further information pertaining to phased approach to the construction activity was shared with AECOM'; however a detailed project timeline is provided in the Appendix C of the report.
Land Requirement	The Project is proposed on approx. 1650 acres of land, comprising 992 acres of private land and approx. 658 acres of government land. Reportedly, the process of signing lease-deed agreements has started since 18 th 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 nd 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. The government land parcels have not been finalized and approved by government authorities to date; nearly 310 Acres of government land (under Phase 1) and 348 Acres (under Phase 2) have reportedly been applied for approvals by EEPL.
EPC Contractor	Sterling and Wilson for civil and electrical works
PV Module	665Wp Mono-crystalline bifacial PV Module
Type of business/ asset	400MW AC Solar Power Plant
Power Evacuation	The power generated will be evacuated to the main GSS (Shapar substation), and GETCO substations through the dedicated Single Circuit 220kV Transmission line (Length ~60 meters). Shrinathji Electricals is the sub-contractor for civil and electrical work for 220 /33 KV PSS

2.1 Project Location

The Project is proposed on land distributed among three villages (Deruki, Ratanpal and Shapa) in Surendranagar District of which Deruki Village shares the maximum land parcel. The overhead transmission line will be connected from the east side of the Project with the 400 kV GETCO Shapar substation (22°28'53.17"N, 71°18'26.10"E). The Project site can be accessed from Rajkot (~60 km) and Ahmedabad (~160 km) which are well connected with other parts of the country, via road, rail, and flights. Rajkot city is the nearest city to the project through NH 47. Rajkot airport is located approximately 60 km from the project site and has flights to other cities in India like Mumbai, Delhi, Bangalore, Indore, Udaipur, and Goa. The Project location is given in **Figure 2-1** below.

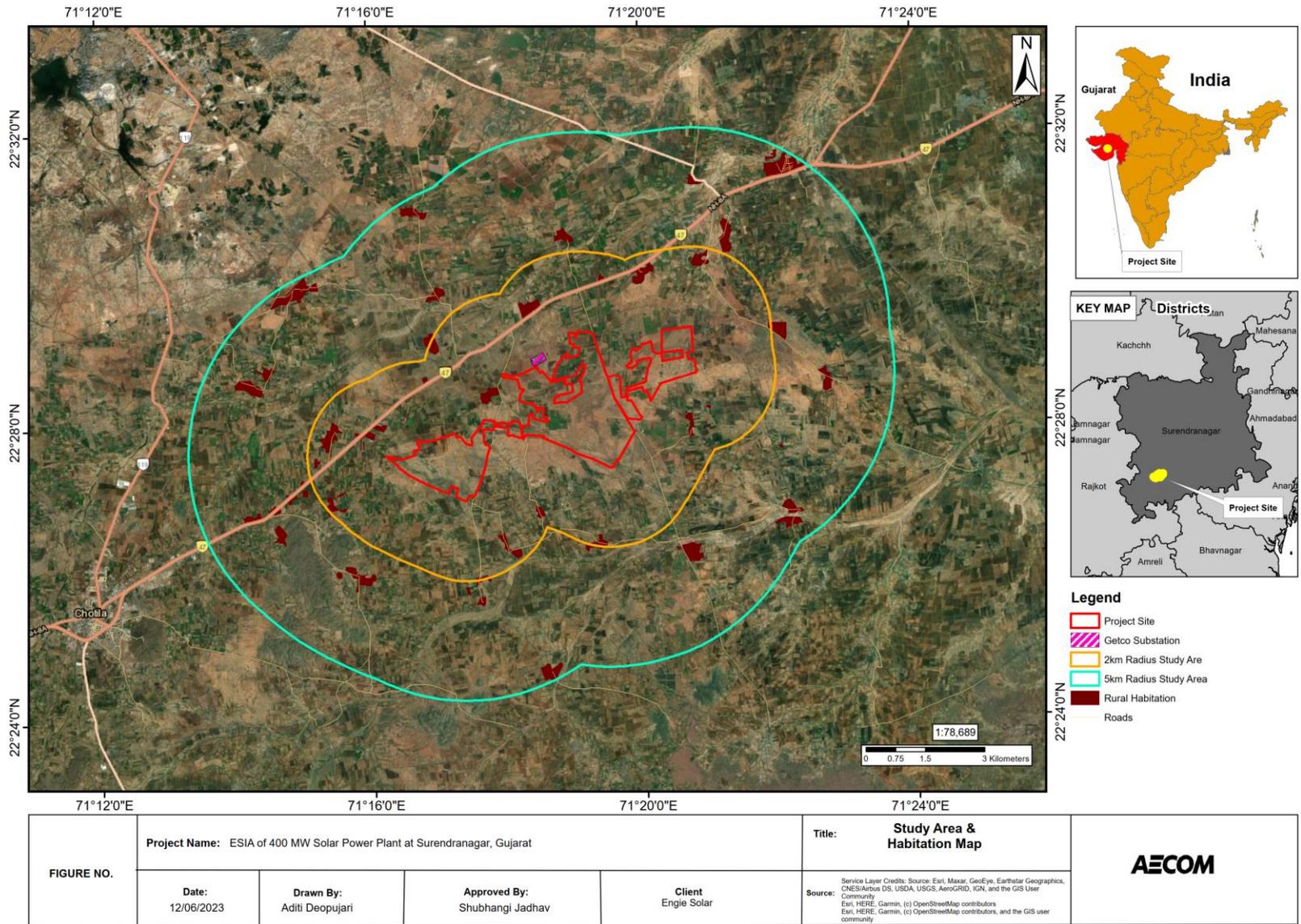


Figure 2-1: Project Location Map

2.2 Project Overview

2.2.1 Project Technology¹

The proposed Project will be based on crystalline silicon technology solar panels and de-centralized inverter. The technology is selected on the basis of energy production and financial cash flow for 25 years. The Project will be connected through a 220KV Overhead Transmission Lines at the GSS 220 KV bay of GETCO's Shapar Substation, and the metering point will be installed at the 220KV switchyard at GETCO's Shapar SS.

2.3 Status of the Project

As part of the environmental and social impact assessment, a site visit was undertaken between 29th May to 2nd June 2023. As on the day of the site visit, the land procurement process was undergoing, and the land team was in the process of negotiation with the landowners. The detailed design of the project was yet to be made available with the site team. The power purchase agreement between Enren Energy Pvt. Ltd. and GUVNL was executed on 15th December 2022 as per certificate no "IN-GJ54726453331876U". The underground transmission line which is ~60 meters from the grid substation was finalised. As per the information received, construction work has already started and following are the current scenarios a) construction of site office is completed b) 20% of the fencing work was being done c) 10-15 solar panels were installed for which the trial run was going on d) 40% of the piling work was completed. The detailed project timeline is provided in the Appendix C of the report.

2.4 Site organization Structure and Workforce

As per the information shared by the site team during AECOM's visit, the organizational structure of SPV for an under-construction phase comprises details of departments, staff, and contract workers. The organizational structure of EEPL is given in the figure below.

The overall management and coordination of the project with respect to EHS will be managed through the Head, EHS, and Project manager at the corporate level. Also, a designated EHS professional/EHS Project (by EEPL) is assigned at the site level to manage the EHS functions and activities during the construction stage (including supervising the day-to-day activities of the Sub-contractors and their team). The Site level EHS Project team will in turn report to the Client's corporate team. The client will be solely responsible for the O&M of the project post the contract period with the EPC.

¹ Detailed project report

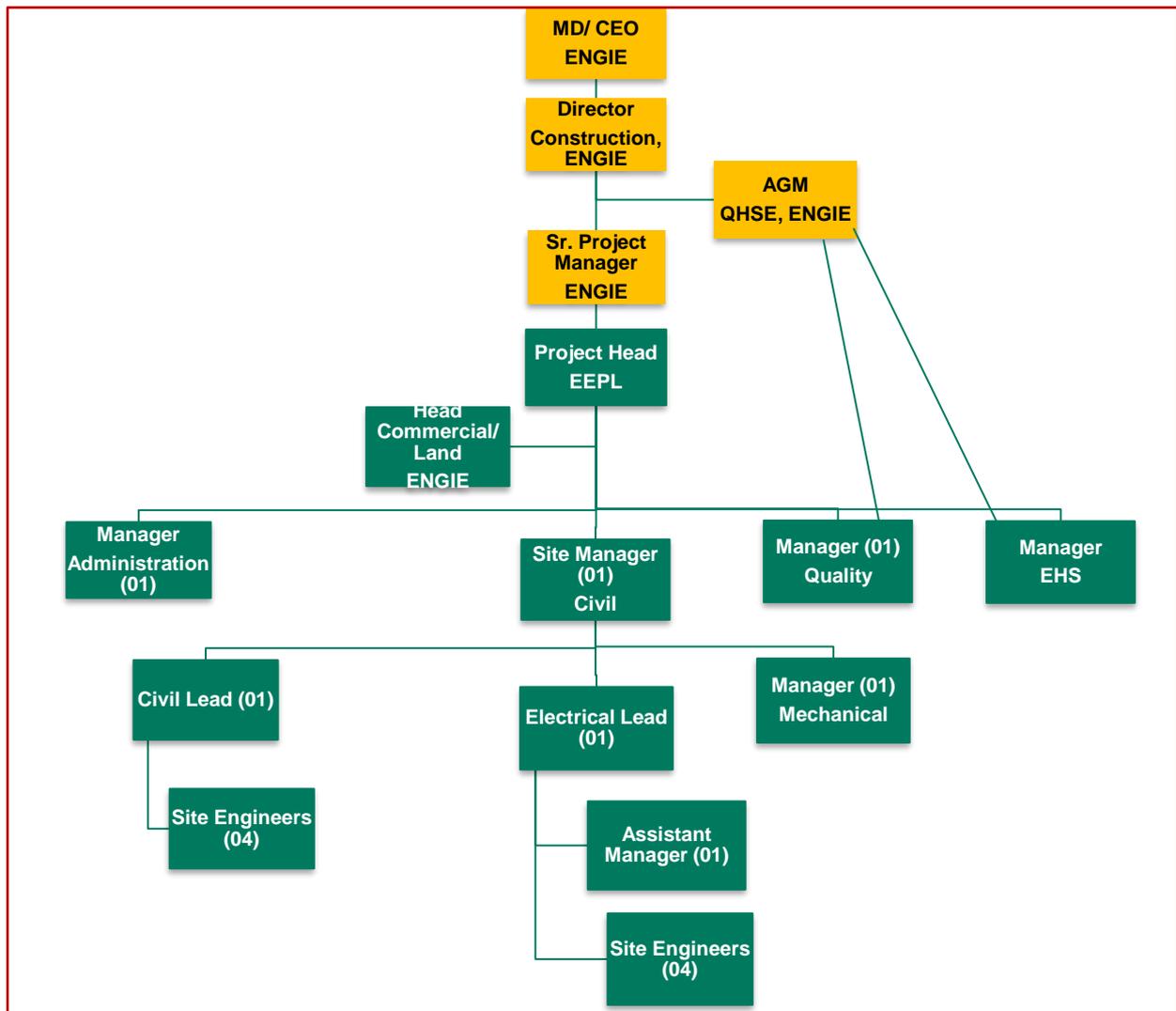


Figure 2-2 Site level Organization Structure of EEPL

Source: Information shared by EEPL site team during AECOM's visit

2.4.1 Workforce Detail

EEPL has engaged M/s Sterling & Wilson Pvt. Ltd. (*hereinafter referred as S&W*), as an EPC contractor, who has further engaged several contractors for civil, electrical and security work. The table below provide details of key contractors and subcontractors engaged currently at the site level.

As per review of documents, EEPL carried out a legal contract agreement with all their contractors prior to their engagement, which clearly give details of their roles, responsibilities, and obligations. Details pertaining to total number of staff and workers engaged currently at site level by SPV including EPC contractor, sub-contractors and security agency etc. were shared with AECOM team.

2.4.1.1 Direct staff

EEPL has reportedly engaged 18 direct staff at the SPV comprising of one HR/ Admin Manager, one EHS and one Liasioning staff. These pay-roll staff have directly been engaged by Engie, where they have been given an appointment letter at the time of joining; these appointment letters had details of work nature, shifts, PF, ESIC, entitled leaves and salary etc. The table below, gives a detail of total manpower along with the break-up of total pay-roll staff engaged at the SPV.

2.4.1.2 Contract workers

In-addition to the Pay-roll staff mentioned above, EEPL has reportedly engaged approximately 80 Contract staff provided by EPC contractor S&W comprising of 1 HR, 4 EHS and 4 Liasioning staff; the remaining 33 staff and workers are provided by M/s Systems Renewable Energy ((*hereinafter referred as SRE*), 45 by M/s Shreenathji Electrical having 1 HR, 1 EHS staff and 2 Liasioning staff, and 07 by security agency. The break-up of total Payroll and contract workers provided by SPV, EPC and sub-contractors is detailed out in table below. EEPL site team

further added that there are no female staff or worker engaged at the facility currently, and the given manpower is for the current stage, i.e., land clearing, pilot testing of pylons and modules and boundary work. The manpower shall increase to 2,000 during peak construction phase.

Table 2-2 Detail of Contractors, staff & workers currently engaged at the SPV

S. No	Name of the Contractor	Responsibility	Total number of staff & workers
1.	EEPL	Payroll staff engaged by Engie to oversee development and construction work	18
2.	M/s Sterling & Wilson	EPC	80
3.	M/s Systems Renewable Energy	Land Aggregation and Liasioning	03
		Boundary wall construction	30
4.	M/s Shreenathji Electricals	PSS Construction work, engaged by EEPL	45
5.	M/s GK Enterprises	Security guards	07
Total			183

Source: Information shared by EEPL during the site visit

2.5 Overview of Environment and Social Management System

EEPL has developed project-specific Environmental and Social Impact Assessment (ESIA) and Management Plan on dated August 2023 for this project. As per the review of ESIA, it has been detailed procedures for identifying aspects of environmental and social impacts during each phase of a typical solar project (construction, commissioning, operation, maintenance, and decommissioning). As per a review of the ESMP manual, it has been stated that prior to the establishment of any solar project, a standard practice to prepare ESMS is required. A procedure has also been mentioned for the identification and evaluation of impacts and risks which is based on impact rating criteria for every phase of the project life cycle (construction, operation & maintenance, and decommissioning).

2.5.1 Environment, Health & Safety Policy

ENGIE has established Environmental and OHS management systems and has obtained certification under the following certifications:

- ISO 9001:2015 certified by Bureau Veritas Certification which is valid till 24th February 2026
- ISO 14001:2015 certified by AFAQ which is valid till 29th July 2025
- ISO 27001:2013 certified by DNV Business Assurance which is valid till 03rd July 2025.

ENGIE has developed 'The Group's Environment Policy' at its global level and has communicated the same to its corporate levels. In particular, The Group's Environment Policy outlines its commitment to for all its activities of ENGIE:

- Encourages action plans that take into account all environmental issues and their possible interactions (for example, an action can address both water and adaptation issues);
- Develops these action plans in consultation with its stakeholders.
- Takes into account environmental health issues.

2.5.2 Occupational Health & Safety (OHS)

The site management has provided AECOM with site-specific HSE Report Master- Engie 400MW ESPL format dated 31st October 2023 for review. As per the review of the HSE report master, all the EHS subjects, and checklists for inspection have been annexed with the format.

Incident/ Accident report & investigation format developed and observed to cover details of a list of applicable contributing factors and corrective action that was taken to minimize the risk of happening again. The format was duly approved by the Head HSE Manager.

2.5.3 Emergency Preparedness and Response Plan (EPRP)

Signed On-site Emergency Plan (R0 dated 06th November 2023) has been developed for the site and was observed that objectives, and type of emergencies were identified in the plan specific to the life cycle of the project.

Site specific emergencies organisation including roles and responsibilities were observed to be allocated to the key persons heading the various departments for handling the emergency situations as per the procedure. Site-specific information such as emergency contact numbers, response team, evacuation plan and use of fire extinguishers etc. have been elaborated in the document.

2.5.4 Water Requirement

Construction Phase

Water requirement during construction phase is primarily for civil work, domestic, and drinking purpose. As reported by the site management, canal water, with all required permissions, will be used for construction activities and no borewell water will be used even though there are 9 borewells reported inside the project footprint to which the site team will do the complete closure of all the borewells. The exact quantity of water requirement for domestic purposes will depend on the number of staff/contract labours who will be deployed but approximately 5-6Ltrs per person will suffice the requirement whereas for construction activities 4000 ltrs of water will be required.

Potable water cans of 20 litres capacity will be used for drinking water at the worker's accommodation facility and will be procured on a daily basis from the local vendors. Similarly for bathing and other usage water tankers will be used.

Operational Phase

As per the review of the ESIA study, a major portion of water consumption in an operational Solar PV Project is during the module cleaning. Usually, 2 to 2.5 litres per module per wash is required for cleaning.

An alternative option to completely avoid such huge usage of water is to employ robotic cleaning for module cleaning. Robotic cleaning is proposed as the appropriate technology for cleaning the modules for this Project, which will have an additional advantage of low operational cost of the PV Plant. For this Project, semi-robotic cleaning will be adopted which means that some of the panels will be cleaned through robotic cleaning and some will be cleaned using soft water.

As reported by the Project team, 590,000 litres of water will be required annually during the operations phase which includes the module cleaning and drinking water requirement. Module cleaning will be done twice or thrice a year for which the O&M team will have an agreement with the vendor for supplying the water. AECOM team was informed that mostly vendors in the nearby area supply water in tankers of various capacity having their source from the canal water. It was also informed that no groundwater will be used for this purpose. Drinking water for the employees will be procured via 20 litre canned bottles.

2.5.5 Land Procurement Status for Solar Park

As per the information shared by EEPL team during consultation, the updated land requirement is 1,650 acres 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 the 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 the lease agreement basis of the 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 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 had started on 18th November 2023 and was completed by the end of 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 22nd 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 the land identification process, legal contract agreement signed between EEPL and SRE, or copy of ATL signed between SRE & private land lessors with AECOM team for review till the time of report finalization, thus no details about it has been given in this report.

Further, during consultation with the site team and identified private land lessors it was informed that they have willingly given their land on lease for the 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 a 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. The details regarding the above-mentioned documents will be detailed out in final RLRP.

Further during site reconnaissance, AECOM identified that 2-3 government land parcels reportedly earmarked for project is being used to grow agricultural crops, i.e., wheat etc. Also one squatter (*temporary residential structure of an agricultural migrant worker*) and a cattle trough² were identified on the government land and a check dam and a shrine located on private land; a photo-doc of the same has been given below.



Photo-doc of a cattle trough identified on Govt. land for common use



Photo-doc of a temporary residential structure³ on Survey No. 133 (Govt. land)

² No consultation with informal users, squatters could be done at this stage, thus govt. land usage could not be ascertained at this. The use of govt. land will be detailed out during LRP finalization.

³ No consultations with squatters associated with the residential structure could be done due to restrictions imposed by EEPL. The details regarding people living in this structure shall be ascertained during LRP finalization.



Figure 2-3: Photo-doc of informal usage of government land

The information pertaining to the 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 above mentioned government land parcels and the PSS land parcels were informally used in recent times for agricultural purposes by small farmers; however, no consultations with the local community, fence-line private landowners, identified informal users, squatter etc. could be done during AECOM's site visit, hence no further details about it could be ascertained at this stage; however, the above-mentioned consultations shall be carried out at the time of LRP finalization. No details regarding cut-off date set for government land was shared with AECOM at this stage, thus AECOM understands that any informal land use shall be duly compensated by EEPL. The impact of government land transfer for the project shall be detailed out in RLRP.

EEPL site team also informed AECOM that the government land parcels have not been finalized and approved by government authorities to 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., the 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 LRP 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.

2.5.6 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 Gujarat Power Corporation Limited'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 the external TL route as the land between PSS and GSS is government land, and no private land shall be required for the same. Reportedly EEPL has submitted the route survey to GETCO.

⁴ No consultation with squatters could be done due to restrictions imposed by EEPL; thus, no detail pertaining to PAEs could be ascertained

Internal Transmission Line

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

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

2.5.7 Land Requirement and Status for Labour Accommodation

As per the consultation with the 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 Chotila village; 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 in one room. As reported by the Engie team there are no inter-state migrant workers currently.

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.

3 Project Categorization

The section below gives detail pertaining to categorization of the project.

3.1 Classification as per MoEF&CC, India

MoEF&CC had brought out notifications in 1989, with the purpose of prohibition/ restriction of operations of certain industries to protect ecologically sensitive Doon Valley. The notification introduced the concept of categorization of industries as “Red”, “Orange” and “Green” with the purpose of facilitating decisions related to location of these industries. Subsequently, the application of this concept was extended in other parts of the country not only for the purpose of location of industries, but also for the purpose of Consent management and formulation of norms related to surveillance / inspection of industries.

According to the Final Document on Revised Classification of Industrial Sectors under Red, Orange, Green and White Categories; February 29, 2016; Central Pollution Control Board; Table G-5: Final List of White Category of Industries, Sl. No 79 Solar power generation through solar photovoltaic cell, wind power and mini hydel power has been classified under White Category.

- Newly introduced White category industrial sectors which are practically non-polluting: and
- There shall be no necessity of obtaining the Consent to Operate” for White category of industries. An intimation to concerned SPCB / PCC shall suffice⁵.

3.2 Classification as per ADB Safeguard Policy Statement (SPS) (2009)

3.2.1 ADB Safeguard Categories

3.2.1.1 Safeguard Requirement 1: - Environment

Proposed projects are screened according to type, location, scale, and sensitivity and the magnitude of their potential environmental impacts, including direct, indirect, induced, and cumulative impacts. Projects are classified into the following four categories:

- **Category A.** A proposed project is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental and social impact assessment (ESIA), including an environmental management plan (EMP), is required.
- **Category B.** The proposed project’s potential adverse environmental impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination (IEE), including an EMP, is required.
- **Category C.** A proposed project is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.
- **Category FI.** A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary’s business activities have minimal or no environmental impacts or risks.

3.2.1.2 Safeguard Requirement 2: -Involuntary Resettlement

The involuntary resettlement impacts of an ADB-supported project are considered significant if 200 or more persons will be physically displaced from home or lose 10% or more of their productive or income-generating assets. For those involving involuntary resettlement, a resettlement plan is prepared that is commensurate with the extent and degree of the impacts: the scope of physical and economic displacement and the vulnerability of the affected persons. Projects are classified into the following four categories:

- **Category A.** A proposed project is likely to have significant involuntary resettlement impacts. A resettlement plan, which includes assessment of social impacts, is required.
- **Category B.** A proposed project includes involuntary resettlement impacts that are not deemed significant. A resettlement plan, which includes assessment of social impacts, is required.
- **Category C.** A proposed project has no involuntary resettlement impacts. No further action is required.

⁵ Final Document on Revised Classification of Industrial Sectors under Red, Orange, Green White Categories; February 29,2016; Central Pollution Control Board;

- **Category FI.** A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary's business activities are unlikely to generate involuntary impacts.

3.2.1.3 Safeguard Requirement 3: -Indigenous Peoples

The impacts of an ADB-supported project on indigenous people is determined by assessing the magnitude of impact in terms of:

- Customary rights of use and access to land and natural resources;
- Socioeconomic status;
- Cultural and communal integrity;
- Health, education, livelihood, and social security status; and
- The recognition of indigenous knowledge; and
- The level of vulnerability of the affected Indigenous Peoples community. Projects are classified into the following four categories:
 - **Category A.** A proposed project is likely to have significant impacts on indigenous peoples. An Indigenous Peoples Plan (IPP), including assessment of social impacts, is required.
 - **Category B.** A proposed project is likely to have limited impacts on indigenous peoples. An IPP, including assessment of social impacts, is required.
 - **Category C.** A proposed project is not expected to have impacts on indigenous peoples. No further action is required.
 - **Category FI.** A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary's business activities unlikely to have impacts on indigenous peoples.

This is so basis the primary data available to date which indicates that the environmental and social risks and impacts of the proposed project activities are expected to be few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures, which supports the classification as below

Safeguard Requirements 1: Environment: The proposed project site is a solar power project which is a clean technology project using solar energy for generation of electricity and no harmful emissions are expected from the project operations, though the monitoring at the site was not done due to land procurement activities. Based on the ADB Policy on categorization of projects, the current project can be categorized as '**Category B**' with respect to environmental impacts. This is based solely on the primary data available to date. Environmental monitoring data was yet to be obtained for the project due to ongoing land purchase. Environmental and social impacts of the Project are anticipated during the operation, construction and decommissioning phase and will encompass changes in land-use, increased noise levels, changes in air quality, use and changes in water availability and quality, occupational health & safety, etc. Most of these impacts are limited to the Project site during construction phase and their immediate vicinity which and can be minimized through application of mitigation measures.

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 a willing lessor and willing lessee basis and government land based on allotment from the district administration. Based on the discussion with the client team and site visit observations, a 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 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 to date; 310 acres of government land under Phase 1 and 348 acres under Phase 2 have been applied for approval. In case there are any risks and/or major impacts, i.e., on informal land users, graziers etc., identified on any government land parcels, the same shall be avoided or carved out of the project area. If the impacts are unavoidable, a resettlement and livelihood restoration plan (RLRP) shall be developed to mitigate the impacts. The mitigation will however be developed post government land allotment is approved and transferred to the project.

Hence, considering the above-mentioned impacts could be mitigated with adequate action plan and RLRP the project is **Categorized as B** for SR2-IR⁶.

Safeguard Requirements 3: Indigenous Peoples: The proposed solar site land including the TL route does not fall under Schedule-V areas as defined in the Indian Constitution under Article 342. The land being involved for solar plant and TL does not comprise 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 significant Scheduled Tribe population residing within the project villages. Hence the proposed project is not expected to have impacts on indigenous peoples and is **Categorized as C**.

Additional rationale for the above categorization is as below:

- Solar power project is a clean technology project using solar energy for generation of electricity;
- No harmful emissions are expected from the project operations;
- The Project Site does not coincide or overlap with any Designated Area; and
- Available data suggests that the construction, operation and decommissioning of the proposed solar project are likely to have limited environmental and social impacts which can be readily addressed with mitigation measures.

⁶ Considering that project may use government land which has informal land users.

4 Environmental & Social Compliance Audit

The environmental and social (E&S) compliance audit, including on site assessment, is required to identify past or present concerns related to impacts on the environment, involuntary resettlement (IR) and Indigenous Peoples (IP) labour and gender. The table below provides status of environmental and social compliance as per ADB Safeguard Policy Statement, 2009

4.1 Status of permits

The project will be implemented within the Indian legal framework (both Central and State / Region level). The applicable Indian environmental regulations are presented in this section.

As per the current regulations of Government of India, Railway projects do not require conducting Environmental Impact Assessment (EIA) studies under the Environmental Regulatory Framework of the Ministry of Environment, Forest and Climate Change (MoEF&CC).

Table 4-1: Applicable Key Indian Legal Requirements – Environment, Health Safety and social

S. No.	Legal Requirement	Issuing Authority	Status
1.	Prevention and Control of Water Pollution	GPCB	As per the section 24 of the Water (Prevention and Control of Pollution) Act, 1974, amended in 1988 no person shall knowingly cause or permit any poisonous, noxious or polluting matter into any stream or well or sewer or on land. As per the GPCB categorization of industries, solar power plants of all capacities are kept under white categories where industries in this category are not included in the consent mechanism. ⁷
2.	NOC And Consent to Establish and Operate for Batching Plant	GPCB	Not Applicable Plant will not have any batching plant during construction phase. Ready Mix concrete will be procured and used.
3.	Environmental clearance	MoEF&CC	A solar power plant is clean option for power generation in comparison to non-renewable fossil fuels. Ministry of Environment, Forest, and Climate Change (MoEF&CC) in its Office Memorandum No. J-11013/41/2006-IA-II (I) dated 13th May 2011 stated that the solar power projects are not covered under the ambit of EIA Notification, 2006 and therefore does not require prior environmental clearance. In addition to this, CPCB issued notification regarding harmonization of classification of industrial sectors under Red/ Orange/ Green/ White categories which states that 'solar renewable power plants of all capacities' are classified as a "White Industry" (Part-A, Serial Number 35) and does not require Consent to Establish and Consent to Operate. Only intimation to the concerned regional officer of State Pollution Control Board (SPCB) shall suffice ⁸
4.	Gram Panchayat NOCs under the provision of Panchayats (Extension to the schedule areas) act, 1996.	Local Gram Panchayats	Obtained As per document review the Project obtained Gram Panchayat NOC from Dhedhukhi and Shapar Gram Panchayats on 12th May 2023.
5.	Principal Employers' Licenses under Contract Labour Act 1970	Department of Labour, Government of Gujarat	Obtained As per document review it was identified that M/s ENREN Energy Pvt. Ltd has obtained principal employer license having its Registration No: SRN/2023/CLRA/DA/4 on Date: 19/10/2023 for three contractors comprising of 1200 workers and is valid till: One time permit

⁷ [White Category Industries CPCB Direction 30042020.pdf \(gujarat.gov.in\)](#)

⁸ As per latest directions of Central Pollution Control Board, dated March 2016, Final report on revised categorization of industrial sectors under Red/ Orange/ Green/ White, solar power projects have been classified under White category of industries. As per the CPCB's direction to SPCB/PPCs, "there shall be no necessity of obtaining Consent to Operate for White Category of industries and intimation to the concerned SPCB/PPC shall suffice.

S. No.	Legal Requirement	Issuing Authority	Status																
6.	Contract Labour License (under Contract Labour Act 1970)	Department of Labour, Government of Gujarat	<p>Obtained, Partially Reviewed Contract labour license as per license no CLRA/License/CLRA/SRN/2023/CLL/53 dated 08/01/2024 issued to sterling and wilson renewable energy. This license will remain valid till 30/06/2024 with few conditions and one being that on any given day the number of workers do not exceed 1000.</p> <p>However, the contract labour license for other contractors are yet to be made available for review</p> <p>As per the review of Principal Employer license, EEPL has engaged three contractors, details of total manpower and license status is given below:</p> <table border="1"> <thead> <tr> <th>Contractors</th> <th>Work</th> <th>Workers (as per Principal employer License)</th> <th>Status of license</th> </tr> </thead> <tbody> <tr> <td>S&W</td> <td>EPC</td> <td>1000</td> <td>Not Obtained. Reportedly S&W will apply for the same prior to starting of construction work</td> </tr> <tr> <td>SRE</td> <td>Land Aggregation and boundary wall construction</td> <td>100</td> <td>Not Obtained. Reportedly SRE will apply for the same prior to starting of construction work</td> </tr> <tr> <td>M/s Shreenathji Electricals</td> <td>PSS Construction work</td> <td>100</td> <td>Obtained Lic No.CLRA/License/CLRA/SRN/2023/CLL/44 on 07/11/2023 and is Valid till:30/06/2024</td> </tr> </tbody> </table>	Contractors	Work	Workers (as per Principal employer License)	Status of license	S&W	EPC	1000	Not Obtained. Reportedly S&W will apply for the same prior to starting of construction work	SRE	Land Aggregation and boundary wall construction	100	Not Obtained. Reportedly SRE will apply for the same prior to starting of construction work	M/s Shreenathji Electricals	PSS Construction work	100	Obtained Lic No.CLRA/License/CLRA/SRN/2023/CLL/44 on 07/11/2023 and is Valid till:30/06/2024
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7.	Private Security Agency (Regulation) Act 2005	Office of the Inspector General of Police, Surendranagar District	<p>Obtained</p> <p>During site visit it was identified that M/s GK Enterprises has engaged 07 security guards at the facility;License granted to Mr. Zaheer Khan for running the private security agency business "GEEKAY security services pvt ltd" as per serial no. PSA/L/47/GJ/2023/SEP/3/1847 which is valid between 26/09/2023 to 25/09/2028. . Reportedly security agency will apply for the same prior to starting of construction work.</p>																
8.	Building and Other Construction Workers Act, 1996;	Department of Labour, Government of Gujarat	<p>Obtained</p> <p>As per consultation with EEPL team, it was informed that the BOCW license shall be obtained by S&W prior to start of construction work.</p> <p>BOCW license vide license no ADISH/BOCW/44/2023 dated 1/6/2024 issued to Shrinathji Electricals for electrical work with max 50 no of building workers employed on any given day. However, it is to be noted that the completion date of the work is mentioned as 30/04/2024.</p> <p>Similarly, BOCW license vide license no ADISH/BOCW/46/2023 dated 1/8/2024 issued to Sterling and Wilson</p>																

S. No.	Legal Requirement	Issuing Authority	Status
			Renewable energy limited for Balance of system (BOS) with max 1000 no of building workers employed on any given day
9.	Inter-state Migrant Workers Act, 1979	Department of Labour, Government of Gujarat	Not Obtained During site visit it was identified that EEPL through its contractors (i.e., M/s Shreenathji Electricals) have engaged migrant workers from Bihar & West Bengal; however, EEPL did not share any Inter-State migrant certificate obtained by Principal employer and sub-contractors for the same. Reportedly EEPL will apply for the same prior to starting of construction work
10.	Land Conversion certificate	Revenue Department, Surendranagar District	Not Obtained As per consultation with EEPL and SRS team it was reported that the project land comprising of both private and government land has not been finalized till date. Also, the land leasing for private land is under process. Thus, land conversion certificate has not been obtained at this stage and shall be obtained post the completion of lease deed (for Pvt. Land) and land transfer (for govt. land). Reportedly, the site cleaning and fencing work are being carried out on only those land parcels for which ATL and/ or lease-deed agreements have been done.

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4.2 Environmental and Social Compliance Status as per ADB Safeguard Policy Statement 2009

Table 4-2: Environmental and Social Compliance Status as per ADB Safeguard Policy Statement 2009

S. No	Aspect	Observations	Gaps	Recommendations
A. Safeguard Requirements 1: Environment				
1.	<u>Environmental Assessment</u> Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks. Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an	Based on EIA Notification, 2006, the project does not fall under category of project requiring environmental clearance, so, no Environment Impact Assessment has been conducted for the project. Organizational capacity: <ul style="list-style-type: none"> The corporate level structure of ENGIE comprises of a Managing Director (MD) at the top of the hierarchy. The MD is followed by the Director of Construction, ENGIE, Sr. Project Manager ENGIE, Head Group Finance, Chief Operating Officer (COO), Chief Technical Officer and Deputy General Manager (Human Resources). As the site visited is currently in the construction phase, site level organization structure responsible was observed for the management of present site activities. According to the site structure of EEPL provided for review, it was observed that the site is headed by a head construction & HSE, and he reports to Project head based at the corporate office. The construction head is followed by a person heading asset HSE (construction), Quality, ESG. 	-	-
			<ul style="list-style-type: none"> Site specific organizational structure missed the inclusion of EPC/Contractors 	<ul style="list-style-type: none"> Existing site-specific organization structure shall be updated with key persons from EPC/Contractor side also (Safety Officer and Admin Officer).

S. No	Aspect	Observations	Gaps	Recommendations
	environmental management plan (EMP) that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.	<ul style="list-style-type: none"> To provide support services, a store coordinator has also been appointed who is headed by an HR Head. As on date, four (04) site engineer, one (01) Electrical Engineers, one (01) Mechanical engineer and one (01) civil lead has been deployed at site report directly to the site Manager. EEPL has established an onsite and offsite training calendar for its staff deployed at sites. It was also noted that EPC contractor has developed a training schedule for onsite staff on various EHS aspects during the construction phase. A training record November 2023 pertaining to subject of fire awareness training, electrical safety training and road traffic management /defensive driving training was verified at the site. Key personnel required from EPC side during construction phase of the project (presence of Safety Officer and Admin Officer) were not identified in the site-specific organization structure. 		
	Conduct an environmental assessment for proposed project to identify potential direct, indirect, cumulative and induced impacts and risks to physical, biological, socio-economic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues) and physical cultural resources in the context of the project's area of influence. Assess potential transboundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.	<p>Policies and procedures</p> <ul style="list-style-type: none"> ENGIE Environmental and societal policy has been developed by EEPL based on the ISO 26000 (Guidance on Social Responsibility). The date of issue on the Policy has been mentioned as May 2016. As per review of policy, it was observed that the management of EEPL is committed to create and preserve value in short, medium and long terms by developing its activities and optimizing management of environmental, social and societal risks in various and ever-changing business contexts. The policy details the Environmental and Societal Responsibility, uniting employees behind a shared vision, Managing the impact on climate change, Managing the use of natural resources, behaving ethically in business sustainably and listening to and engaging in structured dialogue with stakeholders were observed align with Policy. Engie has a renewables GBU health and safety commitment policy where they have identified the safety and health related objectives which was signed by the Engie senior EVP on 15th December 2022. It was noted that ENGIE Environmental and societal policy is linked with other group policies listed are provided below: <ul style="list-style-type: none"> Environmental policy Societal policy 	<ul style="list-style-type: none"> Environmental and social policy lacs issue date, approval date and its signature. Detailed HR policy was found missing 	<ul style="list-style-type: none"> It is recommended that ENGIE Environmental and societal policy shall contain issue date, date of approval and approver's signature. The Policy shall be integrated within the ESMS manual. EEPL is recommended to develop a detailed HR policy comprising of the given below items: <ul style="list-style-type: none"> Policy on Non-Discrimination & Equal Opportunity; Policy on working Hours & Overtime compensation; Policy on Grievance Redressal; Policy on Stakeholder Engagement; Policy on Whistle Blower; Policy on Retrenchment; Policy on prohibition of child labour & forced labour at workplace; Retrenchment policy; Policy on employee training; Policy on anti-sexual & racial harassment; Policy on Health & Safety;

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> - Human resources development and health and safety policies - Procurement and supply policy - Ethics policy - Social responsibility policy - Rassembleurs d'Energies initiative - Tax policy <ul style="list-style-type: none"> • However, the date of issue of policy, approval signature and date of incorporation/implementation of the said policy has not been provided in the document. <p>ENGIE has developed standalone polices on given below items at their corporate level which covers only its direct employees/ Pay-Roll staff.</p> <ul style="list-style-type: none"> ○ Policy on Travel; ○ Policy on Domestic Relocation; ○ Policy on Leave. <ul style="list-style-type: none"> • The given policies do not indicate if it covers manpower engaged at SPVs i.e., both pay-roll staff and contract workers under its ambit. • As per document review and further consultation with site team, it was identified that EEPL has not developed detailed HR policy comprising detail of the given below item <ul style="list-style-type: none"> ○ Policy on Non-Discrimination & Equal Opportunity; ○ Policy on working Hours & Overtime compensation; ○ Policy on Grievance Redressal; ○ Policy on Stakeholder Engagement; ○ Policy on Whistle Blower; ○ Policy on Retrenchment; ○ Policy on prohibition of child labour & forced labour at workplace; ○ Policy on employee training; ○ Policy on Health & Safety; ○ Policy on Prevention of Sexual Harassment at Workplace; ○ Policy on Contractor & vendor engagement etc. • Further, in context to prohibition of child labour, it was informed by EEPL team that no child labour is allowed at the workplace, also EEPL clearly states the provision of non-engagement of child labour & forced labour at the workplace in the contract agreements signed 		<ul style="list-style-type: none"> ○ Policy on Prevention of Sexual Harassment at Workplace; ○ Policy on Contractor & vendor engagement etc. <ul style="list-style-type: none"> • Also, EEPL shall ensure that the given below policies and the policies mentioned above, covers , contract workers and vendors engaged at the SPV under its ambit. <ul style="list-style-type: none"> ○ Policy on Travel; ○ Policy on Domestic Relocation; ○ Policy on Leave. • EEPL shall ensure that all staff and contract workers are given training on the detailed HR policy and record of the training shall be duly maintained and shared whenever required for review.

S. No	Aspect	Observations	Gaps	Recommendations
		with their respective contractors; sample agreement carried out with S&W was reviewed, the provisions for non-engagement of child workers was identified under section 2.10.7 of the contract agreement. No child labours or forced labours were identified by AECOM team during their site visits at respective facilities.		
		<p>Environmental and Social Management System:</p> <ul style="list-style-type: none"> • ENGIE has established Environmental and OHS management systems and has obtained certification under the following certifications: <ul style="list-style-type: none"> – ISO 9001:2015 certified by Bureau Veritas Certification which is valid till 24th February 2026 – ISO 14001:2015 certified by AFAQ which is valid till 29th July 2025 – ISO 27001:2013 certified by DNV Business Assurance which is valid till 03rd July 2025. • ENGIE has developed 'The Group's Environment Policy' at its global level and has communicated the same to its corporate levels. In particular, The Group's Environment Policy outlines its commitment to for all its activities of ENGIE: <ul style="list-style-type: none"> – Encourages action plans that take into account all environmental issues and their possible interactions (for example, an action can address both water and adaptation issues); – Develops these action plans in consultation with its stakeholders; – Takes into account environmental health issues. • As per review of the ESMP developed by EEPL management, it has been stated that prior to the start the construction work a standard practice to develop ESMS management system is required. A procedure has also been developed for identification and evaluation of impacts and risks which is based on impact for every phase of the project life cycle (construction, operation and decommissioning). <p>Engie India have a documented HSE requirements for the solar construction projects where they have mentioned the roles and responsibilities of an individual against the health and safety monitoring, auditing and reporting. This documents also details on the requirements from the contractor's front. However this document only includes these aspects during the construction phase and no operations phase</p> <ul style="list-style-type: none"> • HIRA and Environmental Aspect-Impact matrix was developed for various activities like a) removal of bushes and trees b) unloading of PV modules c) welding and grinding d) fuel handling e) PCC work f) plumbing work etc. 	<ul style="list-style-type: none"> • ESMS lacks topics as per the IFC and ADB requirements and the document misses the inclusion of a) E&S policy b) organizational structure c) training requirements d) monitoring and reporting • Documentation of the monitoring plan including the parameters and the frequency of the monitoring was not found 	<ul style="list-style-type: none"> • Site to develop a full-scale ESMS in alignment with ADB SPS requirements and ensure effectively implement at site and corporate level. • The ESMS document to incorporate the following: <ul style="list-style-type: none"> - Environmental and social policies. - Organizational structure and staffing including skills and competencies in environmental and social areas. - Training requirements; and - Monitoring and reporting. • A monitoring mechanism to be developed for the implementation of project specific environment and social management plan during the operations phase . Documentation of the same is to be maintained at the site office. • Site to establish procedures, inspection pertaining to contractors works and monitoring of the EHS and social aspects, specific to construction and operation phase of site. • Periodic internal audit shall be carried out for the site to assess EHS compliance of the construction and operations phase of the site. • Comprehensive Environmental and Social management procedures to be developed and to be integrated with the ESMS on the followings: <ul style="list-style-type: none"> - Labour camp management; - General housekeeping of the labour camps;

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> HSE committee meeting attended by the employees on 28/12/2023 and the attendance register copy provided. Due date of many action points discussed during the meeting was on 1st week of January 2024 so compliance doc needs to be provided for review Weekly EHS review presentation is prepared covering the details of daily observation report compliance status, reactive management and pr-active management initiatives, safe man work hours. Manpower record, UA/UC master sheet provided where till 31st dec 2023, 51 UC/UC were recorded and all of them were closed as on date of review. Safety walks down by 6 auditors on 21st december was recorded and captured in the mastersheet and all observations were closed. Training record on 13 different topics conducted between 20 nov and 31st dec 2023 were recorded in the mastersheet with the no. of persons, training time categorized under contractor, consultant and client category. As per the ESMP, EEPL needs to develop procedures for inspection, monitoring and auditing during the construction and operations activities which is required on regular basis. The details of the various elements in the procedure has been detailed out below: Environmental Monitoring Plan: - A monitoring plan/monitoring matrix has been developed as a part of the ESMS. The plan covers various significant aspects identified specific to the project pertaining to Environment elements (air quality, noise quality, water quality, electrical hazards and ecological). Every significant aspect has a set of parameters that needs to be monitored with a defined frequency and method for its monitoring. Non-compliance and Corrective Action: - The ESMP has documented for developing a procedure to carry out periodic internal EHSS audits for verify permit requirements and associated compliances. Periodic Audits: The ESMP has also documented that EEPL and its contractor to ensure periodic to be conducted to verify the implementation and effectiveness of ESMP. During the site assessment, a format of internal and external audit was provided for review. As per its review, type of audit, auditee name, audit area and observation summary were covered in the format. However, no such audits, procedures, SOPs for site inspection pertaining to contractor works was available for review as it has not been developed by EEPL. 		<ul style="list-style-type: none"> Traffic management during construction phase; Air emission management; Water and Wastewater Management; and Inventorization and management of hazardous waste apart from modules.
		<p>Emergency Preparedness and response</p> <ul style="list-style-type: none"> A procedure for developing emergency preparedness and response plan has been described in the ESIA. As per review of the procedure, any emergency situation that may occur during the 	<ul style="list-style-type: none"> Off-site EPRP is yet to be drafted 	<ul style="list-style-type: none"> EEPL to formulate an off-site emergency response plan for potentially impacted nearby

S. No	Aspect	Observations	Gaps	Recommendations
		<p>different phases of the construction and operation has to be identified.</p> <ul style="list-style-type: none"> • Identification of emergencies has also been undertaken during project life cycle (construction, operation & maintenance phases) of the project as per review of the procedure. • During the site assessment, signed On-site Emergency Plan (R0 dated 06th November 2023) has developed for the site . As per its review, it was observed that objectives, type of emergencies were identified in the plan specific to the life cycle of the project. However, specific Off- site emergencies were also not identified in the plan. • Sterling and Wilson emergency response plan provided with details of plan along with the org. structure and the contact details. • Mock drill on electrical shock provided, Firefighting mock drill provided on 28/11/2023 having the overall response time of 25 mins. • Site specific emergencies organisation including roles and responsibilities were observed to be allocated to the key persons heading the various departments for handling the emergency situations as per the procedure. • Site specific information such as emergency contact numbers, response team, evacuation plan and use of fire extinguishers etc. have been elaborated in the document. • Location of assembly and fire points were observed to be identified in Plan. • First aiders and fire fighters were also observed to be identified in plan by the EEPL and EPC site management. However, the same information was not updated in the site specific emergency response plan. 		<p>community due to any emergency occurring onsite.</p> <ul style="list-style-type: none"> • Site to ensure implementation of the ERP and conduct regular training and mock drills to train the site personnel for emergency response.
		<p>Contractor Management:</p> <ul style="list-style-type: none"> • All the staff and workers except security agency have been either directly engaged as a Pay-Roll staff or engaged as a contractor. No third-party workers have been reportedly engaged at site level till date; however, EEPL Site Head reported that S&W shall engage third party worker and sub-contractors during construction phase; • The third-party workers shall reportedly be engaged basis of legal contract agreement and shall be covered under EEPL and S&W's policies; however, no documents pertaining to Contractor Management Plan was shared with AECOM for review. 	<ul style="list-style-type: none"> • EEPL does not have a contractor management plan which caters a) all the contract workers under its ambit b) details on non-engagement of child labour c) documentation of worker records etc. 	<ul style="list-style-type: none"> • EEPL is recommended to ensure that they have a Contractor Management Plan. The "Contractor Management Plan" shall comprise details regarding: <ul style="list-style-type: none"> ○ Covering all contract workers under its ambit; ○ Contract period date, i.e., renewal date and expiry date;

S. No	Aspect	Observations	Gaps	Recommendations
		<p>Training: It was informed that a training on general EHS, fire safety, behavioural aspects etc. is conducted every month; however, no details pertaining to their any trainings on community engagement, security trainings on use of force, and appropriate conduct toward workers and affected communities etc. were shared with AECOM for review;</p> <p>Training/workshop provided on the topic "role of security, grooming, patrolling premises and guard alertness" attended by 20 people conducted on 31/01/2024.</p> <p>Docs of the background verification of the employee and the enrolment form was provided for review</p>	<ul style="list-style-type: none"> Presently the trainings provided to the security guards lacks a) training on community engagement b) training on use of force c) behavioural training 	<ul style="list-style-type: none"> Non-engagement of child labour & forced labour at workplace; Documentation of worker records such as valid I-Card, photograph, age proof etc.; It is recommended that security guards are given training on given below aspects and record of the same is maintained and shared whenever required for review: <ul style="list-style-type: none"> Trainings on community engagement, Security trainings on use of force, Behavioural training/ appropriate conduct toward workers and affected communities etc
2.	Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned nongovernment organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a grievance redress mechanism to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance	<ul style="list-style-type: none"> As per the review of documents it was identified that a detailed ESIA Report was prepared for the given project which comprise detailed "Stakeholder Engagement Plan"; a copy of the same was shared for review. The given "Stakeholder Engagement Plan" prepared as part of the ESIA comprised details of primary and secondary stakeholders, methods, and frequency of engagement; however, EEPL did not share any SEP/ policy, tailored as per the site requirement and scale; also, which was duly reviewed and signed by EEPL management; EEPL site team informed that consultations with private landowners, village Sarpanch, local community, government bodies etc. have been carried out till date and their concerns, suggestions have been duly considered; however, no record of stakeholder meetings having detail of date, type of stakeholder, venue, suggestions/ concerns, venue etc. was shared with AECOM for review. 	<ul style="list-style-type: none"> Site specific requirements were found missing in the Stakeholder engagement plan 	<ul style="list-style-type: none"> EEPL is recommended to develop a detailed "Stakeholder Engagement Plan" tailored as per the site requirement and scale; The given SEP shall be duly reviewed and signed by EEPL management; EEPL is recommended to ensure that the record of stakeholder meetings having details such as date, stakeholder category/ detail, venue, suggestions/ concerns, venue etc. are duly maintained and shared whenever required for review.

S. No	Aspect	Observations	Gaps	Recommendations
3.	The borrower/client will establish a mechanism to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the project's environmental performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project. It should address affected people's concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people at no costs and without retribution. The mechanism should not impede access to the country's judicial or administrative remedies. The affected people will be appropriately informed about the mechanism.	<ul style="list-style-type: none"> Based on the consultation with EEPL site team and aggregators it was identified that there is no mechanism currently to records and redress the grievances of external communities; Reportedly, there is no grievance mechanism at the facility level for external stakeholders. In-case of any grievance/ query reported verbally by external stakeholders, i.e., private landowners, it is redressed/ resolved; however, no grievances of external stakeholders have been recorded till date As per the review of documents it was identified that a detailed ESIA Report was prepared for the given project which comprise detailed "Grievance Redressal Mechanism"; a copy of the same was shared for review. The given "Grievance Redressal Mechanism" prepared as part of the ESIA comprised details of: <ul style="list-style-type: none"> Scope of GRM, covering both internal and external stakeholders; Roles & Responsibilities of Grievance Committee; Monitoring & Review of grievances; However, the given GRM did not have details pertaining to grievance escalation process, timeframe of grievance redressal, confidentiality of grievances made by any grievant, mode of meeting grievances and team/ officials responsible for addressing those grievances are detailed out clearly; Also, EEPL did not share the GRM duly reviewed and signed by EEPL management. 	<ul style="list-style-type: none"> Site specific requirements were found missing in the grievance redressal mechanisms Records of the grievances registered at the site were found missing 	<ul style="list-style-type: none"> EEPL is recommended to develop a detailed "Grievance Redressal Mechanism" tailored as per the site requirement and scale prior to construction phase; The given GRM shall be duly reviewed and signed by EEPL management; The GRM shall have details pertaining to grievance escalation process, timeframe of grievance redressal, confidentiality/ anonymity of grievances made by any grievant, mode of meeting grievances and team/ officials responsible for addressing those grievances are detailed out clearly; The policy shall clearly state a procedure to identify affected stakeholders, internal stakeholders, external stakeholders (i.e., local community, fence-line community, village Sarpanch, Graziers, informal govt. land users, govt. land encroachers, commuters, local groups etc.) nearby fence-line community and information pertaining to GRM is given to them in stakeholder meetings with them; . It is recommended that the grievances reported (even verbally) during pre-construction, construction, and operational phase, shall be recorded and shared whenever required for review.
4.	Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.	<ul style="list-style-type: none"> EEPL conducted an Environment and Social Impact Assessment (ESIA) for the project in August 2023 by the external consultant. However, the ESIA report was recently updated again in December 2023 by AECOM based on comments shared by Standard Chartered Bank (SBC) on the initial ESIA report. The updated ESIA report covered impacts on EHS aspects (Air, water, noise, soil) and social aspects (labour, community, economy and employment) and ecological aspects due the project during construction and operation phase. The ESIA report was made available for review and was found to be as per the majority of the requirements of IFC PS. 	<ul style="list-style-type: none"> . 	<ul style="list-style-type: none"> EEPL to develop a storm water drainage mechanism for the project site for proper drainage in designated location

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> The ESIA has identified EHS and Social rules and regulations applicable to solar operations at the national and state level with its applicability. The site management has provided a list comprising government approvals that has been procured for the facility. During interactions with the site management, it was learnt that the compliance with legal requirements like The Water (Prevention and Control of Pollution) Cess Act 1971, Hazardous Waste Management & Handling Rules 2008 were undertaken at the site. HIRA and Environmental Aspect-Impact matrix was developed for various activities like a) removal of bushes and trees b) unloading of PV modules c) welding and grinding d) fuel handling e) PCC work f) plumbing work etc. HSE committee meeting attended by the employees on 28/12/2023 and the attendance register copy provided. Due date of many action points discussed during the meeting was on 1st week of January 2024 so compliance doc needs to be provided for review A document covering the requirements as per the BOCW act was prepared by M/s Shrinathji electricals where they briefly describe the requirement and against which the applicability and the responsible department along with the frequency of check is recorded. No storm water drainage and management has been scoped out as part of the project design, however Engie mentioned that it will be drafted within 2 months post the submission of this final report A hydrological study report is prepared for the project which covers the flood hazard analysis 		
5.	<p>Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment, and its updates if any, to affected people and other stakeholders.</p> <p>Implement the EMP and monitor its effectiveness. Document monitoring results, including the</p>	<ul style="list-style-type: none"> Environmental Management Plan (EMP) also included in ESIA report. EMP also covers the social aspect and health and safety risks. Critical Habitat Screening (CHS) study was conducted for the project in July 2023 by the AECOM on behalf of EEPL to identify any species habitat or designated area which qualify as potential CH triggers 	-	-

S. No	Aspect	Observations	Gaps	Recommendations
		development and implementation of corrective actions, and disclose monitoring reports.		
6.	In areas of Modified Habitat , the Client, as part of project operations, will: <ul style="list-style-type: none"> (i) minimize further conversion or degradation of the habitat; and (ii) identify opportunities (commensurate with the nature and scale of the project) to enhance the habitat, as also, protect and conserve biodiversity. 	<ul style="list-style-type: none"> • As per the ESIA Report (dated Jul 2023), nearly 50% of the approximately 1650-acre Project Site contains modified habitat qualifying as Arable Land habitat-type as per the IUCN Habitat Classification • The Project's ESMP contains measures to minimize degradation of the said habitat as part of standard mitigation expected for modified habitats. • The said measures aim to minimize removal of vegetation, compaction of soil layers, paving of soil surface & pollution/contamination of soil resource at the Project Site. • As per onsite observations recorded during the E&S Compliance Monitoring site visit (dated Nov 2023), the applicable measures, such as restricting vehicular movement to the minimum possible pre-designated routes & maintaining the natural drainage, were not being implemented during the ongoing Pre-construction Phase activities. • As per inputs received from onsite Project personnel during the said visit, the said measures are not incorporated into the Project's Construction Contract. 	<ul style="list-style-type: none"> • The measures committed in the Project's ESMP for minimizing Project-induced degradation of modified habitat are not yet being implemented by the Project. 	<ul style="list-style-type: none"> • It is recommended that the Project ensure immediate implementation of measures committed in the Project's ESMP for minimizing degradation of modified habitat during the Project's Pre-construction Phase. • It is recommended that the Project incorporate into the Project's Construction and O&M Contracts the applicable measures committed in the Project's ESMP for minimizing Project-induced degradation of modified habitat.
7.	In areas of Natural Habitat , the Client will not significantly convert or degrade the habitat, unless <ul style="list-style-type: none"> (i) Alternatives are not available; (ii) The overall benefits from the project substantially outweigh the project costs, including environmental costs; and (iii) Any conversion or degradation is appropriately mitigated. 	<ul style="list-style-type: none"> • As per the ESIA Report (dated Jul 2023), over 50% of the approximately 1650-acre Project Site contains moderately degraded natural habitat qualifying as Savanna habitat-type as per the IUCN Habitat Classification. • The said ESIA identifies loss of the said natural habitat within the Project footprint as a major Project-induced impact as per the Impact Significance Evaluation Matrix applied, but not important owing to its moderately degraded status • The Project ESMP commits mitigation measures that reasonably ensure No Net Loss with respect to the said moderately degraded natural habitat. • The said measures aim to minimize removal of natural vegetation, facilitating vegetation regeneration under solar panels & planting native species in peripheral areas of the Project Site subject to availability of land. • As per onsite observations recorded during the E&S Compliance Monitoring site visit (dated Nov 2023), the applicable measures, such as marking & preserving natural vegetation outside the Project footprint, restricting vehicular movement to the minimum possible pre-designated routes & maintaining the natural drainage, were not 	<ul style="list-style-type: none"> • The measures committed in the Project's ESMP for mitigation of Project-induced loss/degradation of natural habitat are not fully implemented by the Project. • There is no clarity on the content of the training conducted for the project personnel. 	<ul style="list-style-type: none"> • It is recommended that the Project ensure immediate implementation of measures committed in the Project's ESMP for mitigation of loss/degradation of natural habitat during the Project's Pre-construction Phase. • It is recommended that the Project incorporate into the Project's Construction and O&M Contracts the applicable measures committed in the Project's ESMP for mitigation of Project-induced loss/degradation of natural habitat. • Details of the training, in the form of a ppt or text should be shared.

S. No	Aspect	Observations	Gaps	Recommendations
		<p>being implemented during the ongoing Pre-construction Phase activities.</p> <ul style="list-style-type: none"> As per inputs received from onsite Project personnel during the said visit, the said measures are not incorporated into the Project's Construction Contract. As informed by Client, a training was conducted for the existing project personnel on the biodiversity risks and mitigation measures to be implemented during the pre-construction phase. Subsequently, a training attendance sheet was shared by the Client, titled "training on natural habitats" for the project staff. However, details on the content of the training are not available. 		
8.	<p>In areas of Critical Habitat, the Client will not implement project activities, unless</p> <p>(i) There is no likelihood of measurable adverse impacts on the habitat that could impair its biodiversity value or ability to function;</p> <p>(ii) The project will not foreseeably lead to reduction in the population of any recognized endangered or critically endangered species or loss of its habitat; and</p> <p>(iii) Any lesser impacts are mitigated.</p>	<ul style="list-style-type: none"> As per the Project's ESIA Report (dated Jul 2023), the Critical Habitat (CH) Screening (CHS) conducted as part of the ESIA has concluded that the Project Site is unlikely to contain, or be situated within, CH with respect to any of the CH Candidates identified during the CHS. In view of the highly threatened status of 1 CH Candidate, namely CR <i>Sypheotides indicus</i> (Lesser Florican or LF), the Project ESMP commits institution of a Chance Find Procedure (CFP) at the Project Site to ensure appropriate action by Project personnel in the event of any CR <i>Sypheotides indicus</i> (Lesser Florican or LF) individual being detected in or around the Project Site during the life of the Project. In view of the possibly endemic status of 1 CH Candidate, namely LC <i>Ophisops kutchensis</i> (Kutch Small-scale Snake-eye or KSS), the Project ESMP commits measures to protect &/or conserve any individuals of the species present within the Project Site. The said measures aim to avoid potential accidental injury &/or mortality of individuals of the species during the Pre-construction land clearing activities. As per onsite observations recorded during the E&S Compliance Monitoring site visit (dated Nov 2023), the applicable measures, such as removing vegetation in a phased unidirectional manner & engaging a herpetofaunal expert to rescue & rehabilitate any individuals of the species encountered during the vegetation removal, were not being implemented during the ongoing Pre-construction Phase activities. As per inputs received from onsite Project personnel during the said visit, the said measures are not incorporated into the Project's Construction Contract. 	<ul style="list-style-type: none"> The measures committed in the Project's ESMP for mitigation of risk to at-risk species are not yet being implemented by the Project. 	<ul style="list-style-type: none"> - It is recommended that the Project ensure immediate implementation of measures committed in the Project's ESMP for mitigation of risk to at-risk species during the Project's Pre-construction Phase. It is recommended that the Project incorporate into the Project's Construction and O&M Contracts the applicable measures committed in the Project's ESMP for mitigation of risk to at-risk species.
9.	<p>In case of any overlap between the project and a Legally Protected Area, the Client will:</p>	<ul style="list-style-type: none"> As per the ESIA Report (dated Jul 2023), the Project Site does not overlap any Legally Protected Area. 	-	-

S. No	Aspect	Observations	Gaps	Recommendations
	(i) act in consistence with its management plan(s); (ii) consult its managers and stakeholders; and (iii) implement additional programs to promote and enhance its conservation aims.			
10.	In case of known Invasive Alien Species , the Client will: (i) avoid intentional introduction of such species into any new environment; and (ii) minimize the potential for accidental or unintentional spread of such species	<ul style="list-style-type: none"> Review of the ESIA Report (dated Jul 2023) in conjunction with public domain data indicates that the Invasive Alien Species (IAS) <i>Neltuma juliflora</i> recorded in the Project Aol is already well-established throughout the region in which the Project Aol is situated. The Project activities are unlikely to lead to further spread of the species therein. 	-	-
11.	In case of Renewable Natural Resources , the Client will: (i) ensure sustainable use or management to enable its continued use by the community to provide for their current economic, social and cultural needs; and (ii) safeguard the life-sustaining capacity of ecosystems.	<ul style="list-style-type: none"> As per the ESIA Report (dated Jul 2023), the land at the Project Site used to be utilized by the local community for seasonal cultivation of crops &/or grazing of livestock. Development of the Project at the Project Site is anticipated to result in limited loss, or loss of access to, the said arable land or pasture land. The Project's ESMP contains measures to ensure sustainable management of the said lands during the life of the Project & restoration of the pre-Project community land-uses during the Project's Decommissioning Phase. As per inputs received from onsite Project personnel, the measures committed in the Project's ESMP for ensuring sustainable use of renewable natural resources at the Project Site during the Pre-construction Phase have not been incorporated into the Project's Construction Contract. 	<ul style="list-style-type: none"> The measures committed in the Project's ESMP for ensuring sustainable use of renewable natural resources at the Project Site during the Pre-construction Phase are not yet being implemented. 	<ul style="list-style-type: none"> It is recommended that the Project ensure immediate implementation of measures committed in the Project's ESMP for ensuring sustainable use of renewable natural resources at the Project Site during the ongoing Pre-construction Phase activities. It is recommended that measures committed in the Project's ESMP for ensuring sustainable use of renewable natural resources at the Project Site be incorporated into the Project's Construction and O&M Contracts.
12.	Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. Adopt cleaner production processes	<p>Pollution Prevention, Resource Conservation, and Energy Efficiency</p> <p><u>Air emission:</u></p> <ul style="list-style-type: none"> The site has procured a DG set of 25 kVA for meeting power requirement during the construction. However as reported by site management, the installation is in progress and foundation and earthing for the DG set has completed. As reported, diesel will be procured through nearby diesel pump on daily basis as required and no containers stored at site. 	<ul style="list-style-type: none"> Agreement between the vendor and the water supplier was not being done 	<ul style="list-style-type: none"> EEPL shall ensure that existing bore well within the premises shall be closed and share the status of same. Site to maintain and provide the daily water consumption inventory for construction activities and drinking purpose.

S. No	Aspect	Observations	Gaps	Recommendations
	and good energy efficiency practices. Avoid pollution, or, when avoidance is not possible, minimize or control the intensity or load of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation, and release of hazardous materials from their production, transportation, handling, and storage. Avoid the use of hazardous materials subject to international bans or phase outs. Purchase, use, and manage pesticides based on integrated pest management approaches and reduce reliance on synthetic chemical pesticides.	<ul style="list-style-type: none"> As reported by contractor M/s Shrinath Ji which engaged for PCC work, batching plan and Ready-Mix Concrete plant has not been installed at site. The ready concrete is being prepared in concrete mixing machine which is mobile equipment present at site. As per the document provided for review, it was observed that the water sprinkling was performed in order to mitigate the dust/fugitive emission. At present, site has dedicated the below vehicles: <ul style="list-style-type: none"> ENGIE- 3 Nos for field visit of staff EPC-3 Nos for field visit of staff Land Aggregator -1 Nos M/s Shrinath Ji- JCB (01), Tractor (02), water tanker (05) The vehicle inspection and maintenance checklist by with 21 checklist points was provided for review. Ambient air monitoring and noise monitoring test conducted on 24/11/2023 and results were provided for review Stack emission monitoring on 3 different time frames of 34 mins on a single day and the parameter checked were PM, NOx + HC, SO2, CO. Environmental monitoring covering the air monitoring in the office area, inverter room, noise monitoring, Flue gas stack of the DG set 1 and 2, drinking water sample near Inverter 10 and 11 water tank, construction water sample <p><u>Water Consumption:</u></p> <ul style="list-style-type: none"> As per the review of ESIA report, Canal water with all required permissions will be used in construction activities, no bore well water will be used. However, at site 9 nos of existing borewell reported inside the project premises which site management to close all bore wells. As per the review of ESIA report, groundwater monitoring and analysis was conducted for the Project in 2023 as part of ESMP. As reported by the site management, canal/tanker water will be used during the construction and operations phase which will be under the responsibility of the EPC contractor 		<ul style="list-style-type: none"> It is recommended that EEPL and EPC could develop a water management plan which details water sources \options available, water use, treatment requirements and estimated consumption during the operation and construction phase of the project. In addition to it, Water minimization programs to be adopted and KPIs to be used. EEPL shall ensure that the EPC contractor gets the concerned government authority approval for the canal/tanker (or) if the source of water at any point of time is groundwater then the required permission from the gram Sarpanch shall be taken.

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> A sample supply order between the sub-contractor and the water vendor was shared however the sample work order was not shared for review. A copy of the bill receipt for 390 drinking water bottles procurement from the local vendor on 31/12/2023. Service purchase order between S&W renewables and Surya suppliers for 5k litres capacity of water tanker provided for review. However, the daily water consumption/day details and waterlog books/register were not maintained at site and was not available for review. Drinking water testing and analysis results (Report No23GES08/50) dated 30th August 2023 carried out by M/s Global Environmental Services. All results are found within the limits as prescribed in CPCB drinking water. As reported, major portion of the water consumption 2.5 litres/module is an operational Solar PV project is during module cleaning. Site is proposed Robotic cleaning as an alternate option for cleaning the module for this project. 59 lac litres of water will be required annually during the operations phase which includes the module cleaning and drinking water requirement. Module cleaning will be done twice or thrice a year for which the O&M team will be having an agreement with the vendor for supplying the water 		
		<p>Wastes</p> <ul style="list-style-type: none"> EEPL has developed Waste Management Plan (Document No SW-WMP-Engie-GJ400-Rev 00) dated 06th November 2023 signed by Project and HSE manager. The procedure for management of waste such as type, source, storage of waste, housekeeping and handling process and management was observed to be documented in the Plan which is applicable for the site. As reported by site management, any medical waste generated at site such as minor quantity from first aid treatment will be sent to Adesh Hospital, Chotila for the safe disposal for which the agreement was signed. A medical service alliance agreement has been signed between EPC and hospital. Agreement between Sterling and Wilson renewables energy and Total waste management project (TWMP) was signed on 13/12/2023 for the disposal of hazardous waste produced during the course of work. 	<ul style="list-style-type: none"> Segregation of waste at the site was not being followed 	<ul style="list-style-type: none"> EEPL is recommended to segregate and store the waste generated in 3- separate streams bio-degradable, non- biodegradable and domestic hazardous waste (if any) and handover the segregated waste to authorised vendor. Also maintain waste inventory of domestic waste generated at site. EEPL is recommended to maintain records of the hazardous waste at site. Site to ensure that store hazardous waste (used oil and cotton waste) from DG set when generated during construction and operation in a designated location with secondary containment.

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> Tie of letter of the hospital with the Shrinathji electricals was done as per which the hospital will provide all kind of treatment available for the workers, agreement with sterling and Wilson's and ashapura general hospital in Chotila dated 13/09/2023. The wastewater generated from site is discharged into soak pits to be constructed for the project. The same treatment to be followed for labour camps. As reported by site management, no hazardous waste (used oil, cotton waste from DG set) have been generated at site till date therefore agreement with authorised vendor yet be signed. 		
13.	Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimize, adverse impacts and risks to the health and safety of local communities.	<p>Accommodation facility: The workers were identified to be given a rented accommodation facility in village Chotila; the same was visited by AECOM team during their visit. Engie have shared the photograph of the accommodation facility with a toilet, gated bathroom facility; however it was also observed that the workers go for open defecation. Also, the facility was identified to be overcrowded where nearly 15 workers were residing one room.</p> <p>Occupational Health and Safety</p> <ul style="list-style-type: none"> It was observed that EEPL has not developed an Occupational Health and Safety Policy for the employees. The site management has provided AECOM with site specific HSE Report Master- Engie 400MW ESPL format dated 31st October 2023 for review. As per the review of HSE report master, all the EHS subjects, checklist for inspection has been annexed with format. Incident/ Accident report & investigation format were also reviewed. A format form dated 06th November 2023 was reviewed and observed to cover details of list of applicable contributing factors and corrective action that was taken to minimize the risk of happening again. The format was duly approved by the Head HSE Manager. During the assessment, it was reported by the site representative that no accident has occurred till date at the site, however, accident / incident record was not maintained at the site. No inventory of fire extinguishers was provided at site. The records of servicing and maintenance of fire extinguisher were not maintained. The Electrical cables in the inverter room was noted to be laid in clusters on ground near site office, without cable trays. No marking on cable were observed. 	<ul style="list-style-type: none"> Occupational health and safety policy was found missing Accident / incident record was not being maintained at the site level 	<ul style="list-style-type: none"> EEPL is recommended to ensure that the overcrowding at the accommodation shall be avoided. The facility shall be in compliance with IFC EBRD guidelines. EEPL to develop an Occupational Health and Safety Policy and communicate it corporate and site level staff. Procedure for incident and accident reporting covering responsibilities, scope and the way forward to report an incident is to be developed at the corporate level and incorporated within the ESMS apart from the near miss incident/accident report and investigation form which is currently being used. Documents shall be prepared and shall be readily available with regard to Incident/Accident record register. EEPL to ensure that the records of servicing and maintenance of fire extinguisher are maintained. EEPL to ensure that all electrical cable/panels should be covered and adequate number of signages are provided around electrical installations and other hazardous installations at site. Site to ensure that every Standard Operation Procedure developed shall be accompanied by a checklist to assess its adherence (for e.g: checklist for compliance with PPE to be formulated) and integrated within the ESMS.

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> It was observed that the PSS foundation work is in progress stage is being carried by M/s Shrinathji. an electrical pannel near the DG set area were kept in open condition in PSS area. As per review of the procedure of PPE compliance, applicability and responsibilities to implement this procedure has been defined. However, no checklist has been provided to ensure the compliance with PPE usage at the site. 		
		<p>Community Health and Safety</p> <ul style="list-style-type: none"> The site is surrounded by few private agricultural pockets and government land. Currently, the site is in under construction stage. There are chance of off-site hazards or impact on the community related aspects on noise, dust emission and traffic related issues. However, as reported by the site team, EPR has not been communicated to the local community. It was observed that daily traffic movement for the project in the construction phase is project staff vehicles, heavy vehicle movement for material procurement, JCB for excavation for foundation work passing through the Sapar to Dhandhalpur village road twice/trice in day. However, as reported by site team, no accident and incident were observed/recorded till date due to the project activities on the community/village road. 	<ul style="list-style-type: none"> Traffic management plan was not being drafted as per the recommendation in the ESIA report and the same being implemented at the site. 	<ul style="list-style-type: none"> Ensure that Good International Industry Practices are followed when it comes to community health and safety. Site to conduct community consultation with nearby community residents to understand their project related concerns and communicate them through ERP.
14.	Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessment. Provide for the use of "chance find" procedures that include a pre-approved management and conservation approach for materials that may be discovered during project implementation.	<p>AECOM team during site reconnaissance identified one (1) religious structure i.e., shrine, located on private land within project boundary in village Dhedhukhi.</p> <ul style="list-style-type: none"> EEPL further reported that the consultation with private landowner (<i>the owner on whose land identified shrine is located</i>) 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 reportedly 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, consent and consultation record with the private landowner and local community etc. was shared with AECOM; Also, no community consultations were carried out to further understand the local community's association with religious structure. 		<ul style="list-style-type: none"> EEPL shall ensure that consent of local community and private landowner is obtained basis of detailed consultations. Minute of these meetings shall be recorded and shared whenever required for review. In-case of relocating the shrine, EEPL shall ensure that the given structure is duly relocated on identified location with adequate accessibility.

S. No	Aspect	Observations	Gaps	Recommendations
B. Safeguard Requirements 2: Involuntary Resettlement				
1.	Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.	<ul style="list-style-type: none"> As per the information shared, 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 201 landowners and remaining 658 Acres of government land; <p><u>Private land for Solar Park:</u></p> <ul style="list-style-type: none"> Reportedly, the 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. 	<ul style="list-style-type: none"> SOP on land identification and procurement has not been prepared. Detailed resettlement action plan and livelihood restoration plan is still to be carried out. No stakeholder engagement with informal users 	<ul style="list-style-type: none"> EEPL is recommended to develop policy and/or SOP for land identification and procurement; same shall be shared whenever required for review; EEPL is recommended to carry out a detailed "Resettlement & Livelihood Restoration Plan" basis of census survey of the affected households, if any. The given studies shall cover details pertaining to total affected formal and informal land users, type of households getting directly and in-directly affected, type and extent of impact on informal land users, compensation for physical and economic displacement, if any etc. EEPL is recommended to carry out stakeholder meetings with affected informal users of govt. land and private land lessors (in-order to ascertain that the negotiated settlement was carried out prior to leasing, and land leasing did not lead to landlessness and affecting people's livelihood) and maintain records of the same. The "Resettlement & Livelihood Restoration Plan" shall cover PAHs of informal users as well during their census survey. EEPL is recommended to carry out an annual monitoring of the "Resettlement & Livelihood Restoration Plan" in-order to assess impact on the baseline condition.
2.	Carry out meaningful consultations with affected persons, host communities, and concerned non-government organizations. Inform all displaced persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. Establish a grievance redress mechanism to receive and facilitate resolution of the affected persons' concerns. Support the social and cultural institutions of displaced persons and their host population. Where involuntary resettlement impacts and risks are highly complex and sensitive, compensation and resettlement decisions should be preceded by a social preparation phase.	<ul style="list-style-type: none"> It was identified that EEPL has engaged an aggregator SRE for identification of project land, negotiations with private landowners and negotiations with govt. bodies regarding govt. land. Reportedly, 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 ATL. It was also added that the process of signing lease-deed agreements has started since 18th November 2023; the lease-deeds for approx. 285 Acres have been carried out till date and for the remaining private land it shall reportedly be executed by 22nd December 2023. 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. As per document review it was identified that EEPL does not have any policy and/or SOP for land identification and procurement; also, no details pertaining to land identification process, legal contract agreement signed between EEPL and SRE, copy of ATL signed 		

S. No	Aspect	Observations	Gaps	Recommendations
3.	Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing.	<p>between SRE & private land lessors etc. was shared with AECOM team for review till the time of finalizing this report, thus no details pertaining to it has been shared.. However, a flow chart for the private land procurement was shared which shows that in total 146 days are required from the time of doc's collection and submission for legal and ethics till LLA mutation</p> <p><u>Government land for Solar Park:</u></p> <ul style="list-style-type: none"> Further during site reconnaissance, AECOM identified that 2-3 government land parcels 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 chapter 2 above. 		
4.	Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.	<ul style="list-style-type: none"> <u>EEPL site team further added 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 on 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 RAP and LRP shall be developed to mitigate the impact.</u> 		
5.	Prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.	<ul style="list-style-type: none"> However, no further study regarding total affected formal and informal land users, type of households getting directly and indirectly affected, type and extent of impact on informal land users, compensation for physical and economic displacement, if any etc. has been carried out by EEPL till date thus could not be shared for review. A detailed consultation with informal land users, private land lessors and other stakeholders shall be carried out prior to finalization of RLRP; , a flow chart for the government land procurement was shared which shows that in total 180 days are required from the time of doc's collection and submission for legal DD till land mutation 		
6.	Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions and the results of resettlement monitoring. Disclose monitoring reports.	<ul style="list-style-type: none"> 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; 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. 		

S. No	Aspect	Observations	Gaps	Recommendations
		<ul style="list-style-type: none"> EEPL has not developed and implemented any “Resettlement & Livelihood Restoration Plan” till date, thus no monitoring of the Resettlement & Livelihood Restoration Plan objectives has been carried out till date; however, the same shall be carried out post Resettlement & Livelihood Restoration Plan is developed and implemented. 		
C. Safeguard Requirements 3: Indigenous Peoples				
1.	The objective of this SPS is to design and implement projects in a way that fosters full respect for Indigenous Peoples’ identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the Indigenous Peoples themselves so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them.	<ul style="list-style-type: none"> 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. Reportedly, the land being leased for the project does not belong to any ST household and no livelihood dependence of ST HHHs 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. The proposed TL line route does not transverse on any notified tribal land and no land belonging to scheduled tribe is falling within RoW. Thus, PS7 is not deemed applicable at this stage. Further basis of document review and consultation with EEPL and SRE team it was identified that EEPL has not developed any “screening checklist” for identification of any indigenous person/ household getting affected due to project 	No screening checklist for identification of IP, if any	EEPL is recommended to develop a “screening checklist” for identification of IP, if any due to their project and ensure that the same is implemented in-case land is procured of any future expansion.

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
					Within one (01) month post submission of final report		
4.	EHS/HR Policy and procedures	<ul style="list-style-type: none"> Environmental and social policy lacs issue date, approval date and its signature. Detailed HR policy was found missing 	<ul style="list-style-type: none"> It is recommended that ENGIE Environmental and societal policy shall contain issue date, date of approval and approver's signature at India level. The Policy shall be integrated within the ESMS manual. EEPL is recommended to develop a detailed HR policy comprising of the given below items: <ul style="list-style-type: none"> Policy on Non-Discrimination & Equal Opportunity; Policy on working Hours & Overtime compensation; Policy on Grievance Redressal; Policy on Stakeholder Engagement; Policy on Whistle Blower; Policy on Retrenchment; Policy on prohibition of child labour & forced labour at workplace; Retrenchment policy; Policy on employee training; Policy on anti-sexual & racial harassment; Policy on Health & Safety; ; Policy on Prevention of Sexual Harassment at Workplace; Policy on Contractor & vendor engagement etc. 	<p>ENGIE HR head and EEPL project head</p> <p>Corporate and Site HR</p>	<p>Within One (01) Month post submission of final report</p>	<ul style="list-style-type: none"> 1 EHS and 1 HR person for approximately 1 month 	<ul style="list-style-type: none"> Updated ENGIE Environmental and societal policy Human Resource Policy Record of training (given to both staff and contract workers) on HR policy
5.	Accommodation facility provided to workers	<ul style="list-style-type: none"> No toilet and bathroom facility at the labour accommodation, also overcrowded 	<ul style="list-style-type: none"> EEPL is recommended to ensure that the overcrowding at the accommodation shall be avoided. The facility shall be in compliance with IFC EBRD guidelines. 	EEPL project Head, HR and contractors		<ul style="list-style-type: none"> To be decided by Site team 	<ul style="list-style-type: none"> Adequate toilet and bathroom facility and uncrowded accommodation

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
6.	Emergency preparedness and response plan	<ul style="list-style-type: none"> Off-site EPRP is yet to be drafted 	<ul style="list-style-type: none"> EEPL to formulate an off-site emergency response plan for potentially impacted nearby community due to any emergency occurring onsite. Site to ensure implementation of the ERP and conduct regular training and mock drills to train the site personnel for emergency response. The site-specific emergency response plan shall also consider offsite emergencies and include emergency response procedures to be followed by the community. Method of communication with the community in case of emergency shall be detailed in the plan. The offsite emergency response procedures shall be shared with the community, along with emergency contact numbers. 	<ul style="list-style-type: none"> EEPL project head EEPL/EPC HSE site team EEPL project head and EPC 	Within One (01) Month post submission of final report	<ul style="list-style-type: none"> 1 EHS and 1 social person for 1 month Budget for the emergency plans included as part of the EPC contractors work order 	<ul style="list-style-type: none"> Updated ERP included off site emergency. Updated ERP
7.	Stakeholder engagement and grievance redressal mechanism (both for internal and external)	<ul style="list-style-type: none"> Site specific requirements were found missing in the Stakeholder engagement plan Site specific requirements were found missing in the grievance redressal mechanisms Records of the grievances registered at the site were found missing 	<ul style="list-style-type: none"> EEPL re recommended to develop a detailed "Stakeholder Engagement Plan" tailored as per the site requirement and scale; The given SEP shall be duly reviewed and signed by EEPL management; EEPL is recommended to ensure that the record of stakeholder meetings having details such as date, stakeholder category/ detail, venue, suggestions/ concerns, venue etc. are duly maintained and shared whenever required for review. EEPL is recommended to develop a detailed "Grievance Redressal Mechanism" tailored as per the site requirement and scale prior to construction phase; The given GRM shall be duly reviewed and signed by EEPL management; The GRM shall have details pertaining to grievance escalation process, timeframe of grievance redressal, confidentiality/ anonymity of grievances made by any grievant, mode of meeting grievances and team/ officials responsible for addressing those grievances are detailed out clearly; The policy shall clearly state a procedure to identify affected stakeholders, internal stakeholders, external stakeholders (i.e., local community, fence-line community, village Sarpanch, Graziers, informal govt. land users, govt. land encroachers, commuters, local groups etc.) nearby fence-line community and 	Site HR, SRE team and EEPL's land team	Within one (01) month post submission of final report	<ul style="list-style-type: none"> 1 HR and 1 from Land team 	<ul style="list-style-type: none"> Management approved "Stakeholder Engagement Plan"; Record of stakeholder engagements (both internal & external stakeholders) Management approved "Grievance Redressal Mechanism"; Sample grievance register

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
			<p>information pertaining to GRM is given to them in stakeholder meetings with them;</p> <ul style="list-style-type: none"> Facility is recommended to maintain grievance register. It is recommended that the grievances reported (even verbally) during pre-construction, construction, and operational phase, shall be recorded and shared whenever required for review. The GRM shall have details pertaining to grievance escalation process, timeframe of grievance redressal, confidentiality/ anonymity of grievances made by any grievant, mode of meeting grievances and team/ officials responsible for addressing those grievances are detailed out clearly; 				
8.	Monitoring and review	<ul style="list-style-type: none"> Documentation of the monitoring plan including the parameters and the frequency of the monitoring was not found Monitoring of the scheme after its implementation must become a part of the process. 	<ul style="list-style-type: none"> Periodic internal audit shall be carried out for the site to assess EHS compliance of the construction and operations phase of the site. Comprehensive Environmental and Social management procedures to be developed and to be integrated with the ESMS on the followings: <ul style="list-style-type: none"> Labour camp management; General housekeeping of the labour camps; Traffic management during construction phase; Air emission management; Water and Wastewater Management; and Inventorization and management of hazardous waste apart from modules 	EEPL Project head EEPL/EPC HSE team	Within One (01) Month post submission of final report	<ul style="list-style-type: none"> 1 EHS person for approximately 1 month Budget included as part of the EPC contractors work order 	<ul style="list-style-type: none"> Project monitoring mechanism including procedures, inspection of contractors and execution of EHS and social aspect during the operations phase Detailed E& S management procedures, periodic audits internal and external during the operations phase
9.	Air/water and waste prevention	<ul style="list-style-type: none"> Agreement between the vendor and the water supplier was not being done Segregation of waste at the site was not being followed 	<ul style="list-style-type: none"> EEPL shall ensure that existing bore well within the premises shall be closed and share the status of same. Site to maintain and provide the daily water consumption inventory for construction activities and drinking purpose. An agreement should be signed between EEPL and authorised vendor for supplying the water for site It is recommended that EEPL and EPC could develop a water management plan which details water sources \options available, water use, treatment requirements and 	EEPL/EPC HSE EEPL project head and HR	Within one (01) to 02 months post submission of final report	<ul style="list-style-type: none"> 1 EHS person for approximately 1 month Budget included as part of the EPC contractors work order 	<ul style="list-style-type: none"> Status of existing site bore wells. Inventory of daily water consumption (Drinking and construction)

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
			<p>estimated consumption during the operation and construction phase of the project. In addition to it, Water minimization programs to be adopted and KPIs to be used.</p> <ul style="list-style-type: none"> EEPL shall ensure that the EPC contractor gets the concerned government authority approval for the canal/tanker (or) if the source of water at any point of time is groundwater then the required permission from the gram Sarpanch shall be taken. EEPL is recommended to segregate and store the waste generated in 3-separate streams bio-degradable, non-biodegradable and domestic hazardous waste (if any) and handover the segregated waste to authorised vendor. Also maintain waste inventory of domestic waste generated at site. . EEPL is recommended to maintain records of the hazardous waste at site. Site to ensure that store hazardous waste (used oil and cotton waste) from DG set when generated during construction and operation in a designated concrete floor location with secondary containment. 				<ul style="list-style-type: none"> Authorised Vendor for waste disposal Concrete floor with secondary containment Water consumption records during operations
10.	Land Acquisition and Resettlement	<ul style="list-style-type: none"> SOP on land identification and procurement has not been prepared. Detailed resettlement action plan and livelihood restoration plan is still to be carried out. No stakeholder engagement with informal users 	<ul style="list-style-type: none"> EEPL is recommended to develop policy and/or SOP for land identification and procurement; same shall be shared whenever required for review; EEPL is recommended to carry out a detailed "Resettlement & Livelihood Restoration Plan" basis of census survey of the affected households, if any. The given studies shall cover details pertaining to total affected formal and informal land users, type of households getting directly and in-directly affected, type and extent of impact on informal land users, compensation for physical and economic displacement, if any etc. The plan shall include a review of the ongoing land acquisition process (leasing) being undertaken by EEPL to ensure that it abides by the principles of a negotiated settlement and that the transaction will not result in landlessness and/or worsening off of landowners' economic situation. The review shall also consider formal and informal land arrangements (lease, use, labor) by landowners with other farmers in the area. 	EEPL's land team and SRE team	Within three (03) months post submission of final report	<ul style="list-style-type: none"> 1 from EEPL and 1 from SRE land. Further budget for RLRP development and implementation will be decided sby EEPL 	<ul style="list-style-type: none"> Policy and/or SOP for land identification and procurement to reflect ADB's IR screening checklist . Policy and/or SOP for land identification and procurement. "Resettlement Action Plan" and/or "Livelihood Restoration Plan" Semi-Annual monitoring report on the implementation status and

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
			<ul style="list-style-type: none"> EEPL is recommended to carry out stakeholder meetings with affected informal users of govt. land and maintain records of the same. The "Resettlement & Livelihood Restoration Plan" shall cover PAHs of informal users as well during their census survey. EEPL is recommended to carry out an annual monitoring of the "Resettlement & Livelihood Restoration Plan" in-order to assess impact on the baseline condition. 				impact of "Resettlement & Livelihood Restoration Plan".
11.	Security	<ul style="list-style-type: none"> Grievance box at the main gate and within the were not installed Policy on security management and training was missing 	<ul style="list-style-type: none"> It is recommended that security guards are given training on given below aspects and record of the same is maintained and shared whenever required for review: <ul style="list-style-type: none"> Trainings on community engagement, Security trainings on use of force, Behavioural training/ appropriate conduct toward workers and affected communities etc. Also, a GRM shall be displayed in local language at several locations including main gate of the facility; EEPL shall develop a policy on security management and training. 	Site HR and Security Contractor	Within one (01) month post submission of final report	<ul style="list-style-type: none"> 1 HR person for 1 month 	<ul style="list-style-type: none"> Copy of training attendance Policy on security management
12.	Cultural Heritage	<ul style="list-style-type: none"> Consent letter from the local community and private landowners is yet to be obtained. 	<ul style="list-style-type: none"> EEPL shall ensure that consent of local community and private landowner is obtained basis of detailed consultations. Minute of these meetings shall be recorded and shared whenever required for review. In-case of relocating the shrine, EEPL shall ensure that the given structure is duly relocated on identified location with adequate accessibility 	EEPL's land team and SRE team	Prior to starting of construction phase (2-3 months)	<ul style="list-style-type: none"> 1 each from EEPL and SRE land team for 1 month 	<ul style="list-style-type: none"> Record/ Meeting of consultation with Pvt. Landowner and local community. Photo-doc of relocated shrine and Records of relocation and construction expenses incurred by SRE, if any
13.	Modified Habitats / Natural Habitats/ Renewable Natural	<ul style="list-style-type: none"> The measures committed in the Project's ESMP for 	<ul style="list-style-type: none"> It is recommended that the Project ensure immediate implementation of measures committed in the Project's ESMP for mitigation of loss/degradation of modified/ 	EEPL	<ul style="list-style-type: none"> Immediately Prior to commence 		<ul style="list-style-type: none"> Reflection of implementation of Pre-

S. No.	Issue/Risk	Gap	Recommendations and Measurable Outcome	Responsibility	Timeline	Budget/Resources	Completion Indicator
	Resources	mitigating Project-induced loss/degradation of modified/ natural habitat are not fully implemented by the Project.	<p>natural habitat, as also, renewable natural resources, during the Project's Pre-construction Phase.</p> <ul style="list-style-type: none"> It is recommended that the Project incorporate into the Project's Construction and O&M Contracts the applicable measures committed in the Project's ESMP for mitigation of Project-induced loss/degradation of modified/ natural habitat, as also, renewable natural resources. Details on the content of the training on natural habitats conducted for project personnel is not available. 		<ul style="list-style-type: none"> ment of the applicable Project Phases Prior to commencement of operations phase. 		<ul style="list-style-type: none"> construction Phase component of the Project's ESMP in the corresponding compliance monitoring records. Reflection of the applicable components of the Project's ESMP in the Project's Construction and O&M Contracts. Details on the training content, in the form of a ppt or text, To be shared.
14.	Indigenous People	<ul style="list-style-type: none"> No screening checklist for identification of IP, if any 	<ul style="list-style-type: none"> EEPL is recommended to develop a "screening checklist for identification of IP, if any due to their project and ensure that the same is implemented in-case land is procured of any future expansion. 	EEPL's land team and SRE team	<ul style="list-style-type: none"> Within 6 months 	<ul style="list-style-type: none"> 1 each from EEPL and SRE land team for 1 month 	<ul style="list-style-type: none"> Screening checklist for IP identification

Appendix A : Key Documents Reviewed

Sr. No.	Document Name
1	Copy of Travel policy
2	Copy of Domestic Relocation policy
3	Copy of Leave policy
4	Copy of ESIA Report Cope of environmental and societal policy
5	Copy of Principal Employer license
6	Copy of sample attendance record
7	Copy of Contract labour license obtained by M/s Shreenathji Electricals Copy of contract labour license obtained by Sterling and Wilson Renewable Energy Copy of PSARA license to GEEKAY security services pvt ltd
8	Copy of POSH training
9	Copy of Organization structure Copy of oscial and legal register tracker sheet
10.	Copy of Contract Agreement signed between EEPL and S&W

Appendix B : Photolog of Site Visit



Photo-doc of consultation with contract workers



Photo-doc of accommodation facility provided to contract workers



Photo-doc of consultation with security guards



Photo-doc of consultation with private landowner



Photo-doc of consultation with private landowner

Appendix C : Detailed Project Timeline

14 Project Construction	316 days
14.1 PV Plant	316 days
14.1.1 WMS	5 days
14.1.2 Road	140 days
14.1.3 Pile Marking	105 days
14.1.4 Boring	104 days
14.1.5 Casting	104 days
14.1.6 DC Cabling	79 days
14.1.7 AC Cabling	39 days
14.1.8 Tracker installation	62 days
14.1.9 Module Installation	81 days
14.1.9.1 100 MW (1)	15 days
14.1.9.2 100 MW (2)	15 days
14.1.9.3 100 MW (3)	10 days
14.1.9.4 100 MW (4)	15 days
14.1.10 Earthing	50 days
14.1.11 Module Cleaning System	45 days
14.1.12 Drain	100 days
14.1.13 Security Tower	150 days
14.1.14 Street/Periphery lighting	133 days
14.2 Transformer Station	175 days
14.2.1 Civil Foundation	90 days
14.2.2 AC Cabling/OH Line works	90 days
14.2.3 Placement of Inverter	10 days
14.2.4 Installation of IDT	10 days

14.2.5 HT Panel (ICOG/RMU) Installation	10 days
14.2.6 Cable termination	10 days
14.3 33/220 KV Substation	207 days
14.3.1 Substation BOP Readiness	150 days
14.3.1.1 Civil Construction	80 days
14.3.1.2 Installation of 33 KV Equipment	10 days
14.3.1.3 Installation of 220 KV equipment	3 days
14.3.1.4 Gantry Tower	5 days
14.3.1.5 MCR Construction	40 days
14.3.1.6 Installation of CRP	5 days
14.3.1.7 HT Cabling	3 days
14.3.1.8 SCADA installation (SCADA & PPC Panel)	3 days
14.3.1.9 SAS	2 days
14.3.1.10 Capacitor Bank for Reactive Power Compensation	2 days
Task Name	Duration
14.3.2 READINESS OF 100 MW CAPACITY: Installation of 33/220 KV transformer (1 no)	5 days
14.3.3 READINESS OF 100 MW CAPACITY: Installation of 33/220 KV transformer (1 no)	5 days
14.3.4 READINESS OF 100 MW CAPACITY: Installation of 33/220 KV transformer (1 no)	5 days
14.3.5 READINESS OF 100 MW CAPACITY: Installation of 33/220 KV transformer (1 no)	5 days
14.4 220 kV Bay extension (GETCO /ENGIE Scope: to be discussed)	90 days
14.5 Termination of 220 KV line/Cable at GETCO 220 KV Bay (GIS)	90 days
15 Regulatory & Permissions	300 days
16 Testing & Commissioning	87 days

