| Supplementary Document to Ass | sam Sı | ustainable | Wetland | and | Integrate | d Fish | eries |
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| | Tr | ansformat | ion Proie | ct (R | RP IND | 57042 | -001) |

Environmental and Social Management System

Project Number: 57042-001

July 2025

India: Assam Sustainable Wetland and Integrated Fisheries Transformation Project

Prepared by Assam Rural Infrastructure and Agricultural Services (ARIAS) Society, Government of Assam for Asian Development Bank

CURRENCY EQUIVALENTS

(As of 14 March 2025) 1USD = 86.96 INR 1 INR = 0.011

ABBREVIATIONS

ADB - Asian Development Bank

APART - Assam Agri-Business and Rural Transformation Project

ASRLM - Assam State Rural Livelihood Mission

BDC - Beel Development Committee

CPIU - Cluster Project Implementation Unit

DO - Dissolved Oxygen

DOF - Department of Fisheries

EA - Executing Agency

EMP - Environmental Management Plan

FGD - Focus Group Discussion

GIS - Geographical Information System
GRM - Grievance Redress Mechanism

IA - Implementing Agency

IEE - Initial Environmental Examination

IUCN - International Union for Conservation of Nature

MOEFCC - Ministry of Environment, Forests and Climate Change

NGO - Non-government Organizations
OHS - Occupational Health and Safety

PMU - Project Management Unit

REA - Rapid Environmental Assessment Checklist

SMR - Small Multipurpose Reservoir

SPS - ADB's Safeguard Policy Statement (2009)

SWIFT - Sustainable Wetland and Integrated Fisheries Transformation

Project

TA - Technical Assistance

VDC - Village Development Council
WHO - World Health Organization
WUA - Water User Association

Supplementary Document to Assam Sustainable Wetland and Integrated Fisheries Transformation Project (RRP IND 57042-001)

Weight and Measures

dB(A) - A-weighted decibel

ha - hectare km - kilometre

km² - square kilometer

Leq - equivalent continuous noise level

 $\begin{array}{cccc} \mu g & & - & microgram \\ m & & - & meter \end{array}$

m² - square meter

PM - particulate matter of 2.5 micron or 10-micron size

NOTES

- I. The fiscal year (FY) of the Government of India ends on 31 March. FY before a calendar year denotes the year in which the fiscal year ends, e.g., FY2023 ends on 31March 2023
- II. In this report,"\$" refers to US dollars.

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I. INTRODUCTION

- 1. This environmental and social management system (ESMS) is to guide safeguard screening, categorization, management, monitoring, and reporting for beel fisheries business development fund (or the Fund) under the Sustainable Wetland and Integrated Fisheries Transformation Project in Assam (the project). The Fund will be implemented to promote private sector engagement and entrepreneurship development specifically targeting youth in villages surrounding selected beels under the project. The Fund will be utilized to support both upstream and downstream revenue generating activities with the objective of enhanced commercialization of the beel fisheries value chain.
- 2. The Fund is intended to support culture fishery, such as pens/ponds culture for table fish production, seed hatchery, feed mill, primary processing and other value addition initiatives, and marketing (branding, premium market access, certification, traceability). Grants will prioritize for enhancing the fisheries value chain in Assam through strategic partnerships with the private sector, farmer/fisher organizations, SHGs, and cooperatives.
- 3. The Fund will be financed by a \$10.0 million allocation from the project loan and will be implemented over four years (2025–2028). Grants will support up to 60.0% of the cost of subprojects subject to a maximum ceiling.
- 4. Procedures for management of the Fund (including applications, screening, safeguards and financial management) are described in the Fund guidelines for Implementation, which are provided in Project Administration Manual. This ESMS should be read in conjunction with the Fund Guidelines.
- 5. The ESMS will help ensure that subprojects financed under the Fund comply with domestic safeguard requirements and ADB's Safeguard Policy Statement (SPS, 2009).2 The objectives of the ESMS are to: (i) avoid, minimize, mitigate, and/or offset potential adverse environmental and/or social impacts of subprojects financed by the Fund; and (ii) ensure that consultation and transparency is achieved for subproject preparation and/or implementation.

¹ Whilst youth engagement is a priority, the fund is open to applicants from the targeted beel population/ vicinity as individuals or 'groups'.

² ADB. 2009. Safeguard Policy Statement.

II. IMPLEMENTATION ARRANGEMENTS

A. Implementation Arrangements for the Project

6. The executing agency for the project is the Government of Assam, represented by the Assam Rural Infrastructure and Agricultural Services (ARIAS) Society. The project implementation agency is the Directorate of Fisheries (DoF), Government of Assam. The Project Management Unit (PMU) will be based in Guwahati, hosted by the ARIAS Society, and will be led by the State Project Director of the ARIAS Society. The Project Implementation Unit (PIU) will be hosted by the DOF and headed by the Director of Fisheries. The PIU will oversee and manage the activities of five Cluster Project Implementation Units (CPIUs), each led by a Zonal Project Coordinator (Deputy Director, Zonal Office). The District Fisheries Development Officer (DFDO) of the respective district will also be part of the CPIU team.

B. Implementation Arrangements for the Fund and ESMS

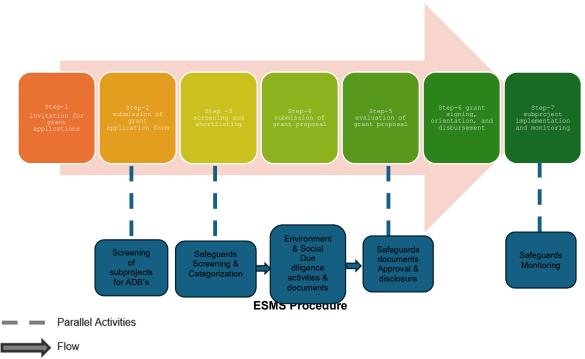
- 7. ARIAS acting through the PMU, will be responsible for implementation of the Fund and ESMS. Responsibilities include leading the establishment of the Fund and ESMS; screening and endorsement of grant applications and disbursements; safeguards monitoring; and reporting. The PMU environment and social safeguard specialists will lead and coordinate the tasks for the ESMS.
- 8. The PMU and safeguard experts will be responsible for: (i) implementation and updating (if required) of the ESMS; (ii) validating safeguard categorization of subprojects; (iii) preparation of safeguard assessments for subprojects; (iv) monitoring of safeguards aspects during project implementation; (v) collating and storing subproject safeguard data; (vi) preparing annual safeguards progress reports; (vii) liaising with the Fund's beneficiaries on safeguard issues; and (viii) liaising with ADB's project safeguard team members on ESMS performance and compliance. The PMU and its safeguard experts will maintain this role throughout at least the four-year duration of the Fund i.e., until the grant financing has been disbursed and the final report on the LMPG is prepared; and longer if needed. The implementation arrangements for the Fund and ESMS are summarized in Table 1.

III. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

A. Matching Grant Process

9. Implementation of the Fund comprises 7 steps: (i) invitation for grant applications; (ii) submission of grant application form; (iii) screening and shortlisting; (iv) submission of grant proposal; (v) evaluation of grant proposal; (vi) grant signing, orientation, and disbursement; and (vii) subproject implementation and monitoring. The ESMS will be applied at each step. The procedures are summarized in Figure 2.

Figure 2: Sample Flow chart of Beel Fisheries Business Development Fund and ESMS procedures



ADB = Asian Development Bank, ESMS = environmental and social management system, PIAL = prohibited investment activity list.

B. Screening and Categorization

- 10. At Fund **step 1** (invitation for grant applications), community consultations to introduce the Fund to potential grant applicants such as private sector, farmer/fisher organizations, SHGs, and cooperatives etc. will include an introduction to the ESMS and safeguard requirements and procedures, to assist applicants in preparing their applications.
- 11. At Fund **step 2** (submission of grant application form), PMU with guidance of the safeguards experts will assess whether the proposed concept includes the likelihood of any activities which are prohibited by domestic laws and regulations (including environmental and social laws; Annexure C1) or which are on ADB's Prohibited Investment Activities List (PIAL)

(Annexure C2). If yes, such concepts will be excluded. Applicants will be informed of the reasons and where feasible, suggestions will be provided to comply with the safeguard screening criteria.

- 12. At Fund **step 3** (screening and shortlisting), the application will be screened in detail for environmental and social risks, against: (i) ADB's PIAL; (ii) the ESMS environmental safeguard checklist (appendices 3 and 4); and (iii) the ESMS social safeguards checklist (screening for involuntary resettlement and indigenous peoples) (Annexure C5). Subproject screening is mandatory for all subprojects to be financed under the Fund. Only subprojects assessed under the ESMS as Category B or C for environmental safeguards and Category C for involuntary resettlement and indigenous peoples will be financed. The PMU and PIU will ensure:
 - no activities having more than limited impacts will be supported by a grant
 - category B and C activities for environment; and category C for social (IR and IP) only.
 - Category B environment will only be eligible if an IEE and EMP has been prepared by the recipient prior to approval, demonstrating that the proposed project meets safeguard requirements and has limited impacts.
 - recipients having limited capacity to implement safeguards will only be eligible to receive grant support for category C activities
 - subprojects comply with national laws and regulations
 - subprojects requiring a full Environmental Impact Assessment (EIA) as per national regulations will not be eligible
 - no physical or economic displacement, including housing demolition, land acquisition, or physical and economic displacement of people;
 - no adverse impacts on indigenous (tribal) people;
 - Activities involving the use of invasive species will not be eligible for support.
 - Activities involving herbicides or pesticides of international concern for ecological impacts (e.g., neonicotinoids) are excluded.
 - Vegetation clearance or tree cutting will only be permitted in built-up areas or agricultural lands.
 - No subprojects will be allowed in Village Grazing Reserves.
 - No activity planned in any nationally ecologically sensitive zones and/or national heritage zones, or affecting nationally protected monuments or structures
 - no conversion of forest, village grazing reserve etc.
 - Any areas that fall within Protected Areas (such as national parks, wildlife sanctuaries, ³ tiger reserves, and elephant reserves), their notified eco-sensitive zones (ESZs), or within 10 km of their boundaries if no ESZ is notified. It will also exclude Ramsar Sites, world heritage sites, key biodiversity areas (KBAs), and important bird areas (IBAs).
- 13. The **environmental screening checklist** serves as a preliminary evaluation to ascertain the necessity for more detailed assessments or audits. For applications without existing facilities or activities, Annexure C3 shall be utilized for screening the proposed subproject. Where there are existing facilities and activities under the proposed subproject by the applicant, Annexure C3 and Annexure C4 shall both be completed for comprehensive screening. Screening checklists will be submitted to ADB for approval to confirm that environmental and social screening has been completed. Each subproject will be designed, constructed, and operated in accordance with relevant national and state social and environmental laws and regulations and policies. The **social safeguards screening checklists** will assess risks related to involuntary resettlement and indigenous peoples.

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³ E.g. notified by the Ministry of Environment, Forest and Climate Change, Government of India under Environment Protection Act 1986; and/or similar such areas notified by state and district agencies and communities.

- 14. The checklists will be prepared by the applicant with the support and guidance of the PIU and CPIU environment and social safeguards focal into one of the following safeguard risk categories: Category A (with potentially significant environmental and/or social impacts); Category B (with less significant environmental and/or social impacts); or Category C (with minimal or no impacts) (Table 2). The safeguard risk categorization process will identify the scale of safeguard risks, to determine the required assessments required (if any) and to identify the safeguard documentation that is needed.
- 15. The PMU will review and endorse the screening and proposed categorizations; and inform the Fund applicant of the requirements as summarized in Table 2. For category B subprojects, the applicant and with support the support of CPIUs and PIU safeguard experts will prepare an initial environmental examination (IEE) and environmental management plan (EMP). To maintain quality assurance: (i) for at least the first year of Fund and ESMS implementation, the screening forms and proposed categorization for all subproject applications will be submitted to ADB for review prior to final PMU/ARIAS endorsement; and (ii) from the second year of Fund implementation (a) only subproject applications assessed to be Category B will be submitted to ADB for prior review, (b) PMU will directly review and endorse subprojects assessed to be Category C, and (c) ADB will conduct intermittent spot-check reviews of subproject categorizations. At any time, in case the ARIAS, PMU and/or PIU are in doubt over a potential safeguard categorization, guidance will be sought from ADB.
- 16. The PMU and/or PIU will ensure that the subproject owners are aware of the applicable requirements via Step 3 of the of the Fund.

Table 1: Safeguard Requirements

| Risk Category | Definition | Environment (ENV) | Involuntary resettlement (INR) | peoples |
|------------------|---|--------------------------------|--------------------------------|--------------------------------|
| A | If the proposed subproject 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. If the subproject is likely to have significant involuntary resettlement impacts. The involuntary resettlement impacts are considered significant, if 200 or more persons will experience major impacts, which are defined as (a) being physically displaced from housing or (b) losing 10% or more of their productive assets (income generating). If the subproject is likely to have significant impacts on indigenous (tribal) peoples. This 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; as well as the level of vulnerability of the affected Indigenous people's community. | Ineligible for grant financing | Ineligible for grant financing | Ineligible for grant financing |

| Risk Category | Definition | Environment (ENV) | Involuntary resettlement (INR) | Indigenous peoples |
|------------------|--|--|--------------------------------|---|
| В | Environment If subproject's potentially adverse environmental impacts are less adverse than category A projects. These 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. | Comply with national laws, ADB PIAL, and sector exclusions Prepare IEE with EMP and / or environmental audit with corrective action plan | financing | Ineligible for grant financing |
| | Social If the subproject includes involuntary resettlement impacts that are not deemed significant If the subproject is likely to have negative impacts on indigenous peoples | Ineligible for grant financing. | • | Ineligible for grant financing |
| С | If the subproject is likely to have minimal or no adverse environmental impacts If the subproject has no involuntary resettlement impacts. If the subproject is not expected to have impacts on indigenous peoples | Comply with national laws and EMP. Prepare environmental and Social DDR | financing. No further action | Eligible for grant financing. No further action required |

ADB = Asian Development Bank, DDR = due diligence report, EMP = environmental management plan, ENV = environment, IEE = initial environmental examination, INR = involuntary resettlement, PIAL = prohibited investment activity list.

17. The PIU safeguard experts will record and store the results of all environmental and social safeguard screenings and categorization. These results will be summarized in the semiannual safeguard progress reports.

C. Due Diligence

- 18. At Fund **step 4** (submission of grant proposal), preparation of the proposal will include safeguard due diligence. The PIU and CPIUs safeguard experts, with the support of the other Team members and other personnel as needed, will undertake the required environmental and social due diligence working with the applicant and relevant agencies. The extent of due diligence will depend on the results of the screening and risk categorization assigned to the application in the Fund step 3. Depending on the subproject's complexity, due diligence can be a desk review followed by a site visit to confirm categorization (for category C subprojects) or based on a site assessment (for environment category B subprojects). The applicant will be requested to provide relevant information and be able to demonstrate compliance with the applicable environmental and social safeguard requirements. The applicant will also receive guidance on the anticipated extent of safeguard risks and measures for safeguard mitigation, monitoring, reporting, and costs. Solutions to address these issues to minimize costs and complexity for applicants, while also avoiding and/or minimizing safeguard impacts, will be discussed. Additional safeguard orientation and support will also be provided in steps 6–7.
- 19. For applications rated as Category B for environment, the CPIUs and PIU environment safeguard expert will lead the preparation of the IEE and EMP, working closely with the applicant and PMU. Template outlines for an IEE and EMP are in Annexure C6. If the subproject involves existing facilities and/or activities, a brief environmental audit report (Annexure C7) and corrective

action plan (CAP) will be prepared. The audit report and CAP will be attached to the IEE. The required environmental safeguards documents will be submitted to the PMU for review at least 15 days before Fund step 5 (evaluation of grant proposal). For applications rated as environment Category C, the PIU environment and social safeguard experts will prepare a due diligence report. The report will confirm minimal impacts and ensure adherence to best practices in environmental management. Annexure C7 provides a template outline and guidance to prepare due diligence reports for subprojects rated as Category C for environmental safeguards as well.

- 20. The PMU will ensure that all investment agreements for subprojects contain adequate environmental and social protection. Subproject beneficiaries will comply with: applicable national laws and regulations relating to the environment; core labor standards; workplace and community occupational health and safety; no use of child labor or forced labor;⁴ and no discrimination against workers in respect of gender, employment and occupation. The CPIUs will conduct intermittent spot checks to subprojects to ensure that any workers engaged by subproject applicants are not restricted from their rights regarding the terms of employment.
- 21. At Fund **step 5** (evaluation of grant proposal), the ARIAS through PMU will issue a memorandum of approval for the safeguard documents. The documents will be disclosed on the ARIAS or project website to ensure transparency and public access to environmental and social information, foster stakeholder engagement and participation, and commitment to the ESMS. The ARIAS will have final authority for the endorsement or rejection of subproject applications.

D. Compliance, Monitoring and Reporting

- 22. At Fund **step 6** (grant signing, orientation, and disbursement) orientation for grant beneficiaries will include follow-up guidance on applicable environmental and social safeguard requirements, to supplement the initial guidance provided at Fund step 4.
- 23. At Fund **step 7** (subproject implementation and monitoring), the PIU safeguard experts with support of the CPIUs safeguards experts will: (i) check subproject bidding documents to verify they include or refer to the subproject's EMP (if applicable); (ii) maintain communications with subproject beneficiaries to confirm their compliance with any subproject-specific safeguard requirements; (iii) conduct occasional site visits as required; and (iv) prepare safeguard monitoring reports for the subprojects, working with the beneficiaries. Site visits will include checks to confirm that any subcontractors are also complying with the subproject safeguard requirements. Safeguard permits and reports will be stored and logged by the CPIUs within the project's performance monitoring system (to be established and maintained by the PMU). All activities of the PIU and CPIUs' safeguard experts will be planned and conducted with the prior review and endorsement of the PMU. The PMU safeguard personnel will review subproject safeguard documents and join subproject site visits regularly (in parallel with the PMU's other safeguard duties across the entire project).
- 24. The Fund grant beneficiary is responsible for safeguard implementation during the operational phase of the subproject and ensuring that any required mitigation and monitoring measures are complied with. The beneficiary will conduct inspections and maintenance of equipment and infrastructure; and ensure that pollution control activities, waste management systems, and other environmental safeguards are effective and operational. Capacity building will be provided to beneficiaries. For environment Category B subprojects, the beneficiary will prepare and submit annual environmental and social monitoring reports.

⁴ International Labor Organization. 2024. <u>C138–Minimum Age Convention</u>, <u>1973 (No. 138)</u>. The convention outlines measures for member signatories to abolish child labor (defined as persons less than 15 years of age).

- 25. The CPIUs' safeguard experts will lead the monitoring of safeguard performance of subprojects, under the guidance of the PIU safeguard expert and with support from the other CPIUs as needed. For subprojects categorized as "B" for environmental safeguards, the safeguard experts in the PIU and CPIUs will evaluate safeguard performance as follows: (i) semiannually, for subprojects categorized as "B" for environment; and (ii) annually, for subprojects categorized as "C" for environment and social safeguards (IR and IP). The benchmark for performance will be ongoing compliance against the specified safeguard requirements for the subproject (if any), ADB's SPS 2009, and domestic safeguard regulations. The PMU on behalf of the ARIAS, will review and endorse the assessments. All monitoring will be included in the project's semiannual safeguard monitoring reports to be submitted to ADB. The safeguards experts in the CPIUs will lead the preparation of the first drafts of these reports, which will be revised and finalized by the PIU and PMU experts prior to approval by ARIAS for submission to ADB.
- 26. In the case of safeguard non-compliance: (i) the PIU and CPIUs' safeguard experts will discuss the issues with the beneficiary to assess the causes for non-compliance and identify time-based solutions, to resolve the issue immediately; and (ii) PMU/ARIAS will inform ADB within 5 days, including corrective actions being undertaken. If non-compliance with the safeguard requirements and/or corrective measures continues, the ARIAS, acting through the PMU, will decide whether additional measures are needed e.g., suspension or cancelation of grant disbursements. All efforts will first be made to support the applicant to resolve. Such discussions will be planned and implemented by ARIAS acting through the PMU, in close cooperation with the applicant and village council, and supported by the PIU and CPIUs' safeguard experts, to ensure that discussions are fair, transparent, and participatory. These steps will also involve the project focal points for the grievance redress mechanism (Section III. E).

E. Grievance Redress Mechanism

- 27. A project-specific grievance redress mechanism (GRM) has been designed to receive, evaluate, and facilitate the resolution of affected persons' concerns, complaints, and grievances about the social and environmental safeguards performance at the project level. The GRM aims to provide a time-bound and transparent mechanism to voice and resolve social and environmental safeguards concerns associated with the project. The GRM provides an accessible, inclusive, gender-sensitive, and culturally appropriate platform for receiving and facilitating the resolution of affected persons' grievances related to the project. The multi-tier GRM for the overall project is outlined below, with each tier having time-bound schedules and responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required. The GRM applies to the entire project including activities under the Fund.
- 28. A project based three-tier GRM arrangement is proposed to facilitate time-bound grievance resolution at each level. Responsible persons and agencies/offices are identified to address grievances and seek appropriate advice at each stage, as required. Institutional arrangements, including constitution of grievance redress committees (GRC) at various levels, will be ensured to function throughout the project duration. The PMU shall ensure the constitution of these committees and oversee the implementation of grievance redress processes, including adherence to time limits, record keeping, and documentation at each level.

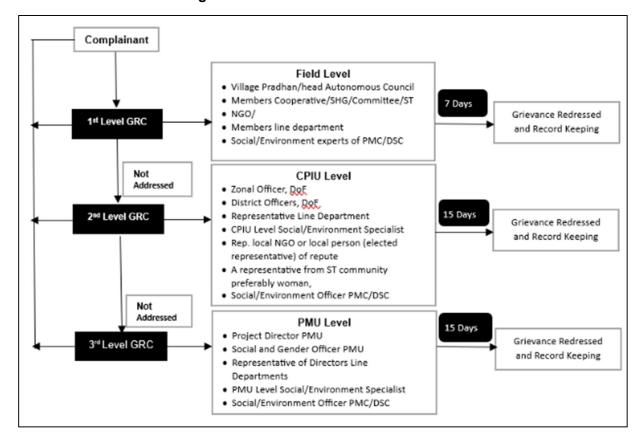


Figure 3: Grievance Redress Mechanism

- 29. **Field Level**: The first level of the GRM will function at the project location/site. The field-level arrangement will consist of ground implementation staff led by the village pradhan/head autonomous council, a , member of cooperative /SHG or committee, STs or a member from a locally existing indigenous grievance settlement mechanism, Social/Environment Expert of CSC and NGO. All minor issues and those perceived as immediate and urgent by the complainant will be resolved at the field level itself (within 7 days). In cases of larger issues that cannot be resolved at the field level, the matter will be escalated to the cluster PIU level GRC, the second level arrangement. A summary of grievance records will be submitted to the PMU monthly. The PIU level Social and Gender Specialist will monitor and provide guidance and support to the field staff in grievance redress and its record-keeping
- 30. Cluster PIU Level: The second GRC will be established at the ZPIU level, headed by the Zonal Officer DoF. The representative of line department like forest and revenue will be member of GRC. The social and environment expert of PIU will facilitate the process of grievance redressal. The committee will include a representative from the local body, or NGO as per the nature of the grievance. All grievances that cannot be resolved at the field level and those directly registered at this level will be addressed by this body within 15 days of complaint receipt. Proper documentation of grievances (including records of grievances redressed at the field level) will be maintained by the PIU. In cases where the GRC at this level is unable to resolve a grievance within the stipulated period, the case will be escalated to a higher level for resolution. The CSC level will also maintain follow-up for each grievance, periodically disseminate information to complainants on the status of their grievance and record their feedback (satisfaction/dissatisfaction and suggestions).

- 31. **PMU Level**: The arrangement at the highest level will involve the constitution of a project-level committee headed by the Chief Executive Officer (CEO) of the PMU as the chairperson. The committee will receive support from the Social Safeguard Specialist/Environmental Safeguards Specialist to grievances. Representative of line departments will be nominated as required based on the type of grievance. All grievances that cannot be resolved by the field level GRC will be brought to the attention of this body, seeking its advice or referral for resolution at this level. Grievances received or referred to this committee will be resolved within 15 days. Periodic information will be provided to complainants on the resolution status of their grievance. The Social Safeguard Specialist will be responsible for compiling grievance redress records, including project-level documentation and reporting.
- 32. The affected person/complainant shall have access to the country's legal system at any stage. Furthermore, accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

2. F. ADB Accountability Mechanism

3.

33. If the established GRM is not able to resolve a grievance, the affected person can also use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer at ADB headquarters or the ADB India Resident Mission (INRM). Before submitting a complaint to the Accountability Mechanism, affected/aggrieved person/s should make a good faith effort to solve the problem by working with the concerned ADB operations department. Only after doing so, and if they are still dissatisfied, will the Accountability Mechanism consider the compliant eligible for review.⁵ The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

4.

5. G. Consultation Arrangements and Information dissemination

6.

34. The GRM will adopt a consultative and participatory approach to grievance resolution, which may, in some cases, require one-to-one consultation with individual complainants or the aggrieved community. Furthermore, the PMU and the PIU Social and Gender Specialist/Environmental Specialist will be responsible for disseminating information to affected persons on the grievance redressal procedure, ensuring that the host community understands the grievance redress process, and encouraging them to register complaints. Adequate consultations, meetings, and public awareness campaigns will be conducted to achieve this objective. Information on grievances received and responses provided will be documented and reported back to the affected persons. All grievances will be treated with utmost confidentiality, and the identity of the complainant will not be disclosed. A sample grievance registration form is provided in Annexure-C8.

7.

35. **Record Keeping.** the PMU with the support of PIU Social and Gender Specialist /Environmental Specialist will maintain the records of all grievances received, including contactdetails of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date these were taken, and outcome. As part of record-keeping and reporting practices, information on grievance tracking will also be maintained. Grievance reporting by PIU and PMU at their respective levels will include information for the reporting period and the cumulative data on select parameters such as total grievances received, redressed, pending, etc.,

⁵ http://www.adb.org/Accountability-Mechanism/default.asp.

since the project's inception. Summarized information will be included as part of periodic reporting by the PMU, with support from PIU, to ADB.

- 36. **Periodic review and documentation of lessons learned**. The PMU will periodically review the functioning of the GRM and record information on the mechanism's effectiveness, particularly in preventing and addressing grievances within the project.
- 37. **Court of Law.** The GRM does not impede or conflict domestic laws and legal procedures. Affected persons have access to the country's legal system at any stage. The proposed project GRM is illustrated in Figure 3.
- 38. **Costs**. CPIU will cover the costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination), while the PIU will handle costs related to further action on intensified.

H. Capacity Building

39. Environmental safeguards staff of the project will conduct training/orientation for CPIUs and PIU, match grant team and subproject owners on the ADB SPS requirements, including screening and categorization of subprojects, as well as on implementing, monitoring, and reporting on the funded subprojects to ensure compliance before the first disbursement and based on their competencies in identifying and implementing environmental category B projects. The designated PIU, CPIUs, ARIAS and PMU, and others related to ESMS implementation will participate in the training. Additional training and workshops will be organized at any time per the request of PMU, PIU, CPIUs and subproject beneficiaries. Table 3 presents the training program on environmental and social management.

Table 2: Capacity Building Training on Environmental and Social Management

| Topic | Trainer | Attendee | Contents | Timeline | |
|---------------|-------------------|---------------------------------|--|--------------|-------|
| ADB Safeguard | ADB Environment | - CPIUs | ADB and EHS laws, | After | loan |
| Policies | and Social | - PIU | regulations and | negotiation | and |
| | specialist, ADB | - PMU | policies | before the | first |
| | Consultants | Contractual | The project's ESMS | disbursement | of |
| | | Staff | policy and requirements | ADB and as | per |
| | Contractual Staff | Subproject | including links to ADB's | need | |
| | (for the Fund, | beneficiaries | SPS (2009), policy | | |
| | CPIUs and | ļ | principles, policy | | |
| | subproject | ļ | delivery process, | | |
| | beneficiaries) | ļ | environmental and | | |
| | | ļ | social safeguard | | |
| | Note: all | ļ | requirements, on | | |
| | subprojects must | ļ | involuntary resettlement | | |
| | receive this | ļ | and indigenous peoples. | | |
| | training prior to | ļ | International | | |
| | subproject | ļ | environmental, health | | |
| | implementation) | ļ | and safety management | | |
| | | ļ | practice in civil | | |
| | | ļ | constructions including | | |
| | | ļ | World Bank EHS | | |
| | | ļ ļ | Guidelines | | |

| Topic | Trainer | Attendee | Contents | Timeline |
|--|---|---|--|---|
| Subproject | ADB Environment and Social specialists, ADB Consultants Contractual Staff (for the Fund, CPIUs and subproject beneficiaries) | CPIUsPIUPMUContractual Staff | Screening and categorization of subprojects against the PIAL and requirements of IEE Environmental and social due diligence and compliance audit including exclusion criteria | Continuous; before the first disbursement of ADB |
| Monitoring; and preparation of corrective action plans | Contractual Staff | CPIUsPIUsubprojectbeneficiaries | Reporting formats, monitoring of projects and preparation of a corrective action plan | |
| GRM | Contractual Staff | CPIUsPIUSubproject beneficiaries | GRM structure, responsibilities, timeframe Types of grievances and eligibility assessment | implementation/ |
| Implementation of ESMS | Contractual Staff | CPIUsPIUSubproject beneficiaries | ESMS objectives, contents, subproject criteria, other issues regarding ESMS | |

ADB = Asian Development Bank, CSO = civil society organization, EHS = environment, health, and safety, GRC = grievance redress committee, GRM = grievance redress mechanism, ESMS = environmental and social management system, Fund = livelihood matching grant program, PIAL = prohibited activities investment list, PIU = project implementation unit, PMU = project management unit, SHG = self-help group, SPS = Safeguard Policy Statement,

Annexures of Environment and Social Management System

Annexure 1: List Of Key Environmental And Social Legislations

A. Environmental Safeguards

Environment (Protection) Act, 1986. The Act is the umbrella legislation that provides for the protection of the environment in the country through Environment (Protection) Rules, which have since been formulated. The Environment (Protection) Act, 1986, serves as a comprehensive framework to safeguard and improve the environment in India. It empowers the central government to take measures for protecting the environment, including setting standards for air, water, and soil quality, regulating industrial emissions, and managing hazardous substances. The Act provides a foundation for issuing environmental clearances and framing notification such as the Environmental Impact Assessment (EIA) Notification, 2006. This rules also includes provisions for Consent to Establish (CTE) and Consent to Operate (CTO) under applicable rules to monitor compliance with prescribed environmental standards.

EIA Notification, 2006, mandates prior environmental clearance for specific projects based on their potential environmental impacts. Projects are categorized into A and B, with Category A requiring clearance from the Ministry of Environment, Forest, and Climate Change (MoEFCC) and Category B from the respective State Environmental Impact Assessment Authorities (SEIAAs). The process involves public consultations, expert appraisals, and detailed project reports, ensuring sustainable development by minimizing adverse environmental effects.

Wetlands (Conservation and Management) Rules 2017. The Wetlands (Conservation and Management) Rules, 2017, establish a regulatory framework for the conservation and sustainable management of wetlands in India. These rules mark a significant shift toward an integrated approach, emphasizing the ecological, cultural, and socio-economic importance of wetlands. Under the framework, wetlands are identified and notified for conservation based on criteria such as ecological sensitivity, biodiversity richness, and their role in maintaining hydrological regimes. Furthermore, they encourage the sustainable use of wetlands by balancing conservation efforts with community engagement and livelihood opportunities.

Water and Air (Prevention and Control of Pollution) Act. The Water (Prevention and Control of Pollution) Act, 1974, and the Air (Prevention and Control of Pollution) Act, 1981, are foundational legislations in India designed to combat pollution and protect natural resources. These Acts empower the Central and State Pollution Control Boards to regulate and monitor pollution levels in water and air, ensuring a clean and healthy environment. The Water Act focuses on maintaining water quality in rivers, lakes, and other water bodies by setting standards, regulating effluent discharges, and promoting the use of wastewater treatment facilities. Similarly, the Air Act seeks to control air pollution by establishing emission standards, designating pollution control areas, and monitoring air quality.

A critical regulatory mechanism under both Acts is the requirement for industries to obtain a Consent to Establish (CTE) before beginning operations and a Consent to Operate (CTO) before commencing production. The CTE ensures that industrial units adhere to prescribed environmental guidelines during the setup phase, while the CTO ensures compliance with operational standards, including emission and effluent norms. These consents are issued by State Pollution Control Boards, serving as tools to prevent pollution at its source and enforce accountability among polluting entities.

Forest (Conservation) Act, 1980. The Act pertains to cases of diversion of forest area and felling of trees. Depending on the size of the tract to be cleared, government clearances are applied at the following levels: (a) if the forest area to be cleared or diverted exceeds 20 hectares (ha) (or 10 ha in hilly area), then prior permission of the central government (Ministry of Environment, Forest, and Climate Change [MOEFCC]) is required; (b) if the forest area to be cleared or diverted is between 5 to 20 ha, the Regional Office of Chief Conservator of Forests (MOEFCC) is empowered to approve; (c) if the forest area to be cleared or diverted is below or equal to 5 ha, the State Forest Department can give permission; and (d) if the area to be clear-felled has a forest density of more than 40%, permission to undertake any work is needed from the central government, irrespective of the area to be cleared. Restrictions and clearance procedure proposed in the Forest (Conservation) Act applies wholly to natural forest areas, even in cases where the protected or designated forest area does not have any vegetation cover.

Wildlife (Protection) Act, 1972. The Wildlife (Protection) Act, 1972, is a key legislative framework in India aimed at the protection of wildlife, including both flora and fauna, and their habitats. The Act provides for the establishment of protected areas such as national parks, wildlife sanctuaries, conservation reserves, and community reserves to ensure in-situ conservation of biodiversity. It also regulates activities that may impact wildlife, making it mandatory to obtain prior clearance from the State Wildlife Board and the National Board for Wildlife (NBWL) under the Ministry of Environment, Forest, and Climate Change (MOEFCC) for any developmental activities proposed in these protected areas. The Act empowers the government to notify endangered species and implement measures for their protection. Hunting of animals listed in the Act's Schedules is strictly prohibited, except under specific circumstances like disease control or threat to human life. The Act also emphasizes the conservation of critical habitats and ecosystems essential for species survival. By regulating human interventions in protected areas and ensuring stringent penalties for violations, the Wildlife (Protection) Act plays a vital role in safeguarding India's biodiversity.

Solid Waste Management Rules, 2016. The Solid Waste Management Rules, 2016, established by the Ministry of Environment, Forest, and Climate Change, provide a comprehensive framework for managing solid waste across urban and rural areas in India. These rules emphasize sustainable practices, resource recovery, and minimizing environmental harm. Key provisions include mandatory segregation of waste at the source into biodegradable, non-biodegradable, and hazardous categories, along with proper disposal through composting, recycling, or scientific landfill management. The rules prohibit open burning and unscientific dumping of waste and mandate local authorities to ensure door-to-door waste collection and transport to designated facilities. Additionally, the rules introduce Extended Producer Responsibility (EPR), requiring manufacturers to manage waste generated by their products, such as packaging materials. They also recognize the role of informal waste pickers, encouraging their integration into formal waste management systems. These rules apply to all citizens, industries, and institutions, promoting a shared responsibility for maintaining cleanliness and sustainability. Non-compliance can result in penalties, making adherence a legal obligation for everyone

Motor Vehicles Act, 1988. The Act empowers the State Transport Authority to enforce standards for vehicular pollution and prevention control. The authority also checks emission standards of registered vehicles, collects road taxes, and issues licenses. In August 1997, the Pollution under Control Certificate program was launched to crackdown on vehicular emissions.

Ancient Monuments and Archaeological Sites and Remains Act, 1958. Under this Act, the area within a radius of 100 meters and 300 meters from a "protected property" is designated as "protected areas" and "controlled areas" respectively. No development (including building, mining, excavation, blasting) is permitted in the "protected area"; and development likely to damage the protected property is prohibited in the "controlled area" without prior permission of the Archaeological Survey of India if the site is protected by it; or the State Department of Archaeology if the site is protected by the state.

Notification for Use of Fly Ash, 2003 (MOEFCC). This Notification is under the Environment (Protection) Act, 1986 and prohibits the use of fly ash in earthworks for roads projects within 100 km of coal-based power plants; to minimize impact on agriculture and protection for land used for earthwork.

MOEFCC circular (1998) on linear plantation on roadside, canals and railway lines modifying the applicability of provisions of Forest (Conversation) Act linear plantations. This circular has been issued to increase forest cover and to protect linear plantations. This circular is effective for states like Raiasthan where forest cover is minimal.

Noise Pollution (Regulation and Control) Act, 1990. Under this Act, MOEFCC has promulgated noise standards for the usage of land during the day and night.

Public Liability and Insurance Act, 1991. This Act provides for protection from transportation, handling, and storage of hazardous materials. The occupier must compensate people who are affected by any mishap or accidents that might happen during handling, transport, and storage.

Explosive Act, 1984. This Act has been enacted for safe transportation, handling, storage, and use of explosive materials.

Minor Mineral and Concession Rules. These rules have been notified for sand mining and for small quarry opening for aggregates.

Mining Act. This Act has been enacted for safe and sound mining activities and for the restoration of mined areas. The act also aims to regulate mining activities.

Indian Fisheries Act 1857. The Indian Fisheries Act of 1857 is one of the earliest legislative efforts in India to regulate and manage fisheries. Designed to oversee both inland and marine fisheries, the Act primarily focuses on protecting fish populations and ensuring sustainable fishing practices. It grants the government authority to regulate activities such as fishing seasons, methods, and equipment to prevent overfishing and preserve aquatic ecosystems. Additionally, the Act prohibits destructive practices like the use of poisons or explosives to catch fish, thereby safeguarding both biodiversity and the livelihood of fishing communities. The Act also empowers local authorities to create rules tailored to specific regions, enabling better management of water bodies and fish resources. While foundational in its scope, the Indian Fisheries Act of 1857 laid the groundwork for subsequent legislation addressing fisheries in a more comprehensive and modern manner. It remains a historical cornerstone in India's regulatory framework for the sustainable utilization and conservation of its rich aquatic resources.

The Assam Fishery Rule of 1953 and 2005 amendment. The Assam Fishery Rule of 1953, along with its subsequent revision in 2005, serves as a regulatory framework for managing and conserving fisheries in Assam. These rules provide guidelines for the sustainable utilization of the state's abundant aquatic resources, which are integral to the livelihoods of local communities and the biodiversity of the region. The framework emphasizes the preservation of fish habitats, equitable access to fishing rights, and the promotion of sustainable fishing practices. The 2005 amendment strengthened the original rule by incorporating measures to combat overfishing and illegal fishing practices. It introduced provisions for leasing out fisheries through a transparent bidding process, ensuring community participation, particularly of local cooperatives and self-help groups, in the management of fisheries. Additionally, the rules mandate compliance with environmental safeguards, promote aquaculture development, and enhance the productivity of beels, ponds, and riverine systems while maintaining ecological balance. This regulatory structure aims to balance conservation efforts with economic development, supporting Assam's fisheries sector and associated livelihoods.

B. Social Safeguards

Right to Fair Compensation in Land Acquisition, Rehabilitation and Resettlement Act, 2013. The Act governs land acquisition and compensation. The Act describes the process to be adopted in notifying the land required for public purposes or a company. It also includes procedures for enquiry, hearing of objections, and the fixing of compensation. The Act prescribes a 2-year time limit from the date of declaration within which the process must be completed. The previous Land Acquisition Act has been revised, and this new Act has been introduced to compensate project affected persons better. The Act aligns its provisions to the goals and objectives of the NRRP, 2007.

Legislations regarding indigenous peoples: Scheduled Caste and Scheduled Tribes (Prevention of Atrocities Act), 1989; Provisions of the Panchayat (Extension to Scheduled Areas) Act, 1996; The Constitution (Eighty-Ninth Amendment) Act, 2003; The Scheduled Tribe and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006.

Child Labor (Prohibition and Regulation) Amendment Act, 2016. The Act prohibits employment of children under 14 years except in family enterprises provided it does not hamper the education of children. Adolescents (14-18 years) are not to be employed in hazardous employment. All facilities shall comply with the act including expansion and modernization.

Maternity Benefit (Amendment) Act, 2017. The Maternity Benefit Act, 1961 protects the employment of women during the time of her maternity and entitles her of a 'maternity benefit' – i.e. full paid absence from work – to take care for her child. The act is applicable to all establishments6 employing 10 or more employees. Per the Act, to be eligible for maternity benefit, a woman must have been working as an employee in an establishment for a period of at least 80 days within the past 12 months. Payment during the leave period is based on the average daily wage for the period of actual absence. Following are the entitlements of a woman:

- (i) Twenty-six weeks of paid maternity leave for mothers; for adoptive mothers 12 weeks of maternity leave from date of adoption:
- (ii) The enabling provision to 'work from home' can be exercised after expiry of 26 weeks leave;
- (iii) The Act has mandated creche facilities for all establishments employing 50 or more employees the women employee should be permitted to visit the facility, four times during the day; and
- (iv) The amendment makes it compulsory for the employers to educate women about the maternity benefits at the time of appointment.

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act. The Act aims to ensure that women are protected against sexual harassment at all the workplaces, public or private. The Act superseded the Vishaka Guidelines for Prevention of Sexual Harassment (POSH) introduced by the Supreme Court (SC) of India. It defines sexual harassment as unwelcome acts or behaviour (whether directly or by implication) namely, physical contact and advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or nonverbal conduct of sexual nature. Any act of unwelcome and sexual nature shall be considered as sexual harassment. The Act also provides the circumstances under which an act may amount to sexual harassment:

- (i) implied or explicit promise of preferential treatment in her employment; or
- (ii) implied or explicit threat of detrimental treatment in her employment; or
- (iii) implied or explicit threat about her present or future employment status; or
- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) humiliating treatment likely to affect her health or safety

The Act envisages the setting up of Internal Complaints Committee at every office of the organisation or institution, having more than 10 employees, to hear and redress complaints pertaining to sexual harassment. Where the number of employees is less than 10, the Act provides for setting up of Local Committee in every district by the District Officer. The committee while inquiring into such complaint shall have the same power as vested in a civil court.

Core Labor Standards. Labor standards are the rules that govern how people should be treated in a working environment. It covers a very wide variety of areas, mainly concerning basic human rights at work, respect for safety and health, and ensuring that people are paid for their work. They also extend to questions of good governance, such as labor inspection and basic labor administration. The core labor standard mandates identification of labor deployment in project activities. The proposed subproject will require labor deployment for the upgradation / expansion of the facility / processing units, which necessitate the need for implementation of applicable laws governing health and safety of the workers that will be engaged during construction activities.

The Fund beneficiaries shall ensure safety and health of the workers, compliance to the existing labor laws with respect to daily working hours, payment of wages, welfare, and compensation. Construction guidelines provided in the IEE are to be incorporated in the bidding document of the civil contractors to ensure that suggested safeguard measures are adhered to during construction. The PIU with the guidance of the PMU shall monitor the compliance by the contractor. The guidelines will broadly cover the following:

⁶ Include factories, mines, plantations, Government establishments, shops and establishments under the relevant applicable legislation, or any other establishment as may be notified by the Central Government.

- (i) freedom of association and recognition of the right to collective bargaining;
- (ii) compliance with provisions of the labor laws applicable to the sector;
- (iii) elimination of all forms of forced or compulsory labor;
- (iv) effective abolition of child labor;
- (v) elimination of discrimination in respect of employment and occupation same wage for same work;
- (vi) participation of local laborers, women in construction works; and,
- (vii) health and safety of workers, including provision of labor camps, sanitary facilities, drinking water, health and safety programs for workers, and awareness on HIV/AIDS/ sexual health.

Annexure 2: ADB Prohibited Investment Activities List

The Exclusion List supports the proper execution of the environmental and social risk assessment procedure. SWIFT Project will not invest in, lend to, or engage in harmful activities to the environment, harmful or dangerous to people or communities. In particular, the following activities will not be supported:

- 1. Any activity classified environment category A for environment
- 2. Production or activities involving harmful or exploitative forms of forced labor⁷ or child labor⁸
- 3. Production or trade in any product or activity deemed illegal under the Indian laws or regulations or international conventions and agreements, or subject to international phase outs or bans, such as (a) pharmaceuticals⁹, pesticides, and herbicides¹⁰, (b) ozone-depleting substances¹¹, (c) polychlorinated biphenyls and other hazardous chemicals¹², (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora¹³, and (e) transboundary trade in waste or waste products¹⁴
- 4. Production of or trade in weapons and munitions, including paramilitary materials
- 5. Production of or trade in alcoholic beverages, excluding beer and wine 15
- 6. Production of or trade in tobacco²¹
- 7. Loans associated with individual gambling, casinos and equivalent entreprises²¹
- 8. Production of or trade in radioactive materials, ¹⁶ including nuclear reactors and components thereof
- 9. Production of, trade in, or use of unbonded asbestos fibers¹⁷
- 10. Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests
- 11. Marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats
- 12. Mining activities
- 13. Activities involving genetically modified organisms.

⁷ Forced labor means all work or services not voluntarily performed, that is, extracted from individuals under threat of force or penalty

⁸ Child labor means the employment of children whose age is below the host country's statutory minimum age of employment or employment of children in contravention of International Labor Organization Convention No. 138 "Minimum Age Convention" (www.ilo.org).

⁹ A list of pharmaceutical products subject to phaseouts or bans is available at http://www.who.int.

¹⁰ A list of pesticides and herbicides subject to phaseouts or bans is available at http://www.pic.int

¹¹ A list of the chemical compounds that react with and deplete stratospheric ozone resulting in the widely publicized ozone holes is listed in the Montreal Protocol, together with target reduction and phaseout dates. Information is available at http://www.unep.org/ozone/montreal.shtml.

¹² A list of hazardous chemicals is available at http://www.pic.int.

¹³ A list is available at http://www.cites.org.

¹⁴ As defined by the Basel Convention; see http://www.basel.int.

¹⁵ This does not apply to subproject sponsors who are not substantially involved in these activities. Not substantially involved means that the activity concerned is ancillary to a subproject sponsor's primary operations.

¹⁶ This does not apply to the purchase of medical equipment, quality control (measurement) equipment, and any equipment for which ADB considers the radioactive source to be trivial and adequately shielded

¹⁷ This does not apply to the purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

Annexure 3: Environmental Safeguards Screening Checklist

| Title of Match Grant Proposal: | |
|--------------------------------|--|
| Location: | |
| Cluster Name: | |
| Applicant Name and Address: | |

Reviewers Details

| Environmental Aspect | Construction Phase | During Operations | Remarks (Please provide potential |
|---|--------------------|----------------------|-----------------------------------|
| | (Check if True) | (Check if True) | impacts) |
| Location | | | |
| Is the subproject near a cultural heritage site? | | | |
| Is the subproject near or within a legally protected | | | |
| area (core zone or buffer zone)? | | | |
| A. Land | | | |
| Environmental Disruption: Will construction | | | |
| activities cause disturbance to nearby | | | |
| surroundings, such as felling of trees, closing of | | | |
| any water body, displacement of animals, or other | | | |
| impacts? | | | |
| Soil Erosion: Will the activity/facility cause direct | | | |
| soil erosion or lead to soil erosion subsequently? | | | |
| Land Degradation: Will the subproject cause | | | |
| degradation through the use of chemicals, | | | |
| overuse of water, removal of topsoil, or other | | | |
| activities that disturb the land? Solid Waste: Will the project generate | | | |
| substantial non-biodegradable solid wastes (e.g., | | | |
| substantial non-blodegradable solid wastes (e.g., ≥ 20 kg per day)? | | | |
| Toxic Wastes: Will the project generate any toxic | П | | |
| wastes? | | | |
| Presence of Eco-sensitive Zone: Will the | | | |
| project cause loss of habitat to the natural | | | |
| surroundings? | | | |
| Impact on Beel Fisheries: Will the construction | | | |
| or operational activities impact the quality or | _ | | |
| quantity of fish populations in the beel? | | | |
| Impact on Beel Habitat: Will the project disturb | | | |
| or degrade the natural habitats (e.g., nesting | | | |
| areas, spawning grounds) of aquatic species in | | | |
| the beel? | | | |
| B. Water | | | |
| Water Usage: Will the project consume more | | | |
| than 5,000 liters of water per day? | | | |
| Surface Water Quality: Does it involve the | | | |
| discharge of pollutants to surface water sources? | _ | | |
| Ground Water Quality: Will the project cause | | | |
| seepage of toxic chemicals and wastes into the | | | |
| ground? Impact of Fish Hatcheries: Will the project | | | |
| | | | |
| cause deterioration in water quality or quantity | | | |

| Environmental Aspect | Construction | During | Remarks (Please |
|--|--------------------|-------------------------|----------------------------|
| | Phase (Check if | Operations (Check if | provide potential impacts) |
| | True) | True) | impuotoj |
| that could affect the beel, ponds, or other fish | , | , | |
| culture systems? | | | |
| Use of Water for Aquaculture: Will the project's | | | |
| water usage impact local fish ponds or culture | | | |
| systems in nearby beels? | | | |
| Will the project cause deterioration of water | | | |
| sources to the extent of adversely affecting the | | | |
| biodiversity of adjoining water sources? | | | |
| C. Air | | | |
| Emissions: Will the project involve emissions of | | | |
| greenhouse gases (GHG), particularly CO2, | | | |
| NOX, dust, particulate matter, etc.? | | | |
| Usage of Chemicals: Will the project use | | | |
| chemicals, such as refrigerants, with a global | | | |
| warming potential? | | | |
| Impact on Air Quality from Fish Feed Mills: | | | |
| Will the operation of feed mills or other | | | |
| processing facilities result in air pollution or | | | |
| particulate matter that could affect the | | | |
| surrounding communities? | | | |
| D. Flora and Fauna | _ | | |
| Will the project lead to loss of flora (e.g., felling of | | | |
| trees, land clearing for vegetation)? | | | |
| If yes, is/are the species of flora endangered, vulnerable, or threatened? | | | |
| Are there any endangered, vulnerable, or | | | |
| threatened species of flora/fauna within the | | | |
| project influence area (1 km radius)? | | | |
| Are there any notified protected areas, national | П | | |
| parks, or wildlife sanctuaries within 1 km radius of | | | |
| the project? | | | |
| Are there any migratory routes of animals or birds | | | |
| within the project influence zone (1 km)? | | | |
| Is there any forest | | | |
| (reserved/protected/community forest) area | _ | | |
| within the project influence zone? | | | |
| Will the project lead to the loss of fish species, | | | |
| particularly endangered or vulnerable species, in | | | |
| the local beel systems due to over-exploitation or | | | |
| habitat loss? | | | |
| Are there any critical ecosystems (e.g., wetlands, | | | |
| beels) that support fish populations that may be | | | |
| affected by the subproject? | | | |
| E. Climate Vulnerability | | | |
| Is the project located in flood-prone areas | | | |
| Assam? | | | |
| Is the project located in landslide- or erosion- | | | |
| prone areas? | | | |
| Is the project located within a critical watershed? | | | |
| Will the project be exposed to high temperature | | | |
| increases (including heatwaves)? | | | |

| Environmental Aspect | Construction Phase (Check if True) | During Operations (Check if True) | Remarks (Please provide potential impacts) |
|---|---|--|--|
| Will the project be exposed to highly intensive rainfall? | | | |
| Will the project be exposed to cyclones/storm surges? | | | |
| Will the project be located in a seismically active zone prone to earthquakes? | | | |
| Is the project located in an area prone to landslides? | | | |
| Is the project site situated on or near loose, unconsolidated soils that could lead to subsidence? | | | |
| Are there any recorded occurrences of sinkholes in or around the project area? | | | |
| Will climate change or extreme weather events (e.g., flooding, drought) negatively impact fish production or fish culture in the project area? | | | |
| F. Socio-economic Factors | | | |
| Does the project involve occupational health and safety issues? | | | |
| Does the project involve health hazards? | | | |
| Does the project involve land acquisition? | | | |
| Does the project involve loss of access to sources of income or livelihood, particularly related to fishery or aquatic farming activities? | | | |
| Does the project involve disturbance of residents living near the project area? | | | |
| Will the project contribute to increased traffic congestion in the surrounding area? | | | |
| Will the project reduce accessibility to main roads, highways, and nearby urban centers? | | | |
| Could the limited size of the project site result in overcrowding? | | | |
| Does the project likely disturb any physical, cultural, or religious resources (e.g., places of worship, sacred groves, graveyards, tribal land)? | | | |
| Does the following receptors come within the project influence area: school, hospital, health clinic, market area, etc.? | | | |
| Will the project support local fishery communities through improved access to fish seed, feed, and value-added fish products? | | | |
| Will the project create employment opportunities in fishery value chains such as hatcheries, feed mills, processing, and marketing? | | | |

Annexure 4: Environmental Safeguards Screening Checklist For Existing Facility

Name of Existing Facility: Location: Cluster/District Name: Applicant Name and Address:

Reviewers Details

| Question | Yes | No | Not | Remarks |
|--|-----|----|-------|---------|
| · | | | Known | |
| Is there sufficient area available for the existing facility and other | | | | |
| value-added initiatives? | | | | |
| Does the facility have valid consent to establish and consent to | | | | |
| operate or other permits from the government? | | | | |
| Does the facility have an appropriate storm water drainage structure? | | | | |
| Does the facility have valid fire safety clearance in place? | | | | |
| Does the facility have an appropriate arrangement for the collection | | | | |
| and disposal of wastewater and sewage/septage being generated at | | | | |
| the facility? | | | | |
| Does the facility use diesel generators (DG) set? If yes, does the | | | | |
| facility have a valid DG set operating certificate? Does the facility | | | | |
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| | Ш | | | |
| | | | | |
| Does the facility have provision for rainwater harvesting? | | | | |
| Does the unit experience any extreme events induced by climate | П | П | П | |
| change, such as floods, droughts, cyclones, storm surges? If yes, | | | _ | |
| does the facility have a plan in place to reduce physical | | | | |
| damages/operational disruption from such events? | | | | |
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| Are key facilities outdated or nearing the end of their service life? | | | | |
| , and the second | | | | |
| quality, environmental compliance, and safety? |] | | | |
| follow appropriate standard operating procedures for handling and management of spent oil? Does the facility appropriately dispose of spent oil? Does the facility have air cooling equipment? If yes, does the facility use any phased-out HCFC gas for air cooling/refrigeration? Does the unit use groundwater for drinking/toilet purposes? Does the facility have provision for rainwater harvesting? Does the unit experience any extreme events induced by climate change, such as floods, droughts, cyclones, storm surges? If yes, does the facility have a plan in place to reduce physical damages/operational disruption from such events? Does the facility use and maintain an appropriate solid waste management system and dispose of collected waste in an appropriate manner through the relevant authority? Does the facility have SOPs in place for handling and management of hazardous waste, if any, generated at the site? Are all key facilities and infrastructure currently fully operational (100%)? If not, please indicate the current percentage of operational capacity in the remarks. Do the existing facilities and equipment meet regulatory standards for safety, efficiency, and performance? Does the infrastructure and equipment require urgent maintenance, upgrades, or replacements to meet operational or safety standards? Are key facilities outdated or nearing the end of their service life? | | | | |

Annexure 5: Social Safeguards Impact Screening Checklists

A. Introduction

Each application/proposal must be screened for any involuntary resettlement impacts or impacts on indigenous peoples. Only Category C applications/proposals will be financed under the grant.

B. Information on subsection/section:

| D. I | mormation on subsection/section: | | | | |
|------|---|------------|------------|------------------|--------------|
| | a. Title of Proposal: | | | | _ |
| | b. District/Administrative Name: | | | | _ |
| | c. Location: | | | | _ |
| | d. Civil Work Dates: | | | | |
| | e. Technical Description: | | | | _ |
| | • | | | | |
| | Screening Questions for Involuntary Resettlem | | | | |
| | bable Involuntary Resettlement Effects | Yes | No | Not Known | Remarks |
| Inv | oluntary Acquisition of Land | | | | |
| 1. | Will there be land acquisition? | | | | |
| 2. | Is the site for land acquisition known? | | | | |
| 3. | Is the ownership status and current usage of land to | | | | |
| | be acquired known? | | | | |
| 4. | Will easement be utilized within an existing Right of | | | | |
| | Way (ROW)? | | | | |
| 5. | Will there be loss of shelter and residential land due to | 0 | | | |
| | land acquisition? | | | | |
| 6. | Will there be loss of agricultural and other productive | | | | |
| | assets due to land acquisition? | | | | |
| 7. | Will there be losses of crops, trees, and fixed assets | | | | |
| | due to land acquisition? | | | | |
| 8. | Will there be loss of businesses or enterprises due to | | | | |
| | land acquisition? | | | | |
| 9. | Will there be loss of income sources and means of | | | | |
| | livelihoods due to land acquisition? | | | | |
| 10. | "land compensation requirement' | | | | |
| Inv | oluntary restrictions on land use or on access to le | gally des | signated | parks and pro | tected areas |
| 11. | Will people lose access to natural resources, | | | | |
| | communal facilities, and services? | | | | |
| 12. | If land use is changed, will it have an adverse impact | | | | |
| | on social, livelihood and economic activities? | | | | |
| 13. | Will access to land and resources owned communally | <i>'</i> | | | |
| | or by the state be restricted? | | | | |
| 14. | compensation for those that will be affected by loss of | f | | | |
| | access or reduced in income land use changes | | | | |
| | ormation on Displaced Persons: | | | | |
| 15. | Any estimate of the likely number of persons (male/fe | male) an | d number | of households | that will be |
| | displaced by the Project? | | | | |
| | [] No. [] Yes | | | | |
| | o If yes, how many? which location/area | | | | |
| 16. | Are any of them poor, female-heads of households, o | r vulnera | ble to pov | erty risks? | |
| | [] No [] Yes | | | n salanda di 9 | |
| | 16b. Estimated numbers of affected individuals/familie | es of Indi | genous o | r ethnic minorit | y groups and |
| | location/area? | | | | |

17. Are any displaced persons from indigenous or ethnic minority groups? [] No

| Probable Involuntary Resettlement Effects | Yes | No | Not Known | Remarks |
|--|---------|-----------|-----------------|--------------|
| 17b. Estimated numbers of affected individuals/families location/area? | of indi | genous or | ethnic minority | y groups and |

D. Screening Questions for Indigenous Peoples Impact Screening

| D. Ocicenning Questions for inalgenous i co | ор.оср | | 9 | 1 |
|--|--------|----|--------------|---------|
| KEY CONCERNS (Please provide elaborations on the Remarks column) | YES | NO | NOT KNOWN | Remarks |
| Indigenous peoples Identification | | | | |
| 1. Are there socio-cultural groups present in or use the project area who may be considered as "tribes" (hill tribes, schedules tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities" in the project area? | | | | |
| 2. Are there national or local laws or policies as well as anthropological research/studies that consider these groups present in or using the project area as belonging to "ethnic minorities", scheduled tribes, tribal peoples, national minorities, or cultural communities? | | | | |
| 3. Do such groups self-identify as being part of a distinct social and cultural group? | | | | |
| 4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories? | | | | |
| 5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture? | | | | |
| 6. Do such groups speak a distinct language or dialect? | | | | |
| 7. Has such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against? | | | | |
| 8. Are such groups represented as "indigenous peoples" or as "ethnic minorities" or "scheduled tribes" or "tribal populations" in any formal decision-making bodies at the national or local levels? | | | | |
| Identification of Potential Impacts | | | | |
| Will the project directly or indirectly benefit or target indigenous peoples? | | | | |
| 10. Will the project directly or indirectly affect indigenous peoples' traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance) | | | | |

| KEY CONCERNS (Please provide elaborations on the Remarks column) | YES | NO | NOT KNOWN | Remarks |
|---|-----|----|--------------|---------|
| 11. Will the project affect the livelihood systems of indigenous peoples? (e.g., food production system, natural resource management, crafts and trade, employment status) | | | | |
| 12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous peoples, and/or claimed as ancestral domain? | | | | |
| Identification of Special Requirements Will the project activities include: | | | | |
| 13. Commercial development of the cultural resources and knowledge of indigenous peoples? | | | | |
| 14. Physical displacement from traditional or customary lands? | | | | |
| 15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of indigenous peoples? | | | | |
| 16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous peoples? | | | | |
| 17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous peoples? | | | | |
| Identification of Informed Consent and Consultation | | | | |
| Was the project and its impacts presented and discussed with tribal leaders/elders of the community? Was the project and its impacts publicly presented, discussed and processed by | | | | |
| community members and their elders/leaders? Was the project endorsed and consented to by local tribal leaders/elders or council? by members of the community? | | | | |

| KEY CONCERNS (Please provide elaborations on the Remarks column) | YES | NO | NOT KNOWN | Remarks |
|---|-----|----|--------------|---------|
| Was the concerns, issues and grievances raised and mitigation measures identified by local tribal leaders/elders and council or members of the community on the project and its impacts presented, documented and addressed satisfactorily? Where the project mitigation measures and recommendations identified, presented and recommended by local tribal leaers/elders and council and members of the community, adopted and integrated into the project design, construction, implementation and operations? | | | | |

Anticipated project impacts on indigenous peoples

| Project component/ activity/ output | Anticipated positive effect* | Anticipated negative effect* |
|--|------------------------------|------------------------------|
| 1. | | |
| 2. | | |
| 3. | | |

^{*}Indicate the effects on IPs or enter 'Not Applicable or N/A' as necessary.

Annexure 6: Outline of an Initial Environmental Examination and Environment Management Plan

The activities and outputs of the initial environmental examination (IEE) process will vary with the nature of each project and in context to the project site. The level of detail and comprehensiveness of an environmental examination report should be commensurate with the impacts and risks of the project. Nevertheless, environmental examination and management for ADB-supported projects typically includes the following:

Executive Summary. This section describes concisely the critical facts, significant findings, and recommended actions.

Policy, Legal, and Administrative Framework. This section delineates the national and local legal and institutional frameworks governing the conduct of the environmental assessment. For a comprehensive list of applicable policies, refer to **Annexure C1** of the ESMS. Additionally, this section identifies international environmental agreements pertinent to the project, to which the country is a signatory.

Description of the Project. This section delineates the proposed subproject and its principal components. It typically includes drawings and maps illustrating the layout and components of the subproject, the subproject site, and the subproject's area of influence. The business proposal shall serve as a valuable source of information for this section.

Description of the Environment (Baseline Data). This section delineates the pertinent physical, biological, and socioeconomic conditions within the study area. The results derived from the site visits and secondary information shall serve as a valuable source of information for this section. Attachment 1 to this Annexure is a sample discussion of this section.

Anticipated Environmental Impacts and Mitigation Measures. This section predicts and assesses the project's positive and negative impacts to physical, biological, socioeconomic, and physical cultural resources in the subproject's area of influence.

Analysis of Alternatives. This section examines alternatives to the proposed project site, technology, design, and operation.

Public consultation. It is a process through which subproject proponents seek the feedback of stakeholders and the public in decision-making processes. This engagement aims to ensure that the views and concerns of those affected by a proposal are duly considered.

Grievance Redress Mechanism This section describes the grievance redress framework (both informal and formal channels), setting out the time frame and mechanisms for resolving complaints about environmental performance.

Environmental Management Plan. This section deals with the set of mitigation and management measures to be taken during subproject implementation to avoid, reduce, mitigate, or compensate for adverse environmental impacts. See attachment to this Annexure about a sample EMP.

Conclusion and Recommendation. This section provides the conclusions drawn from the assessment and provides recommendations.

Attachment 1 to Annexure 6: Guidance to prepare baseline section of the IEE

Climate:

- Provide basic information about the weather patterns at the proposed site, including average temperature, rainfall, and seasonal variations.
- Mention significant weather events common at the proposed site, such as monsoons, which might be intense, or the occurrence of cold spells during the winter.

Geology and Soil:

- Highlight visible geological features unique to the proposed site, like any surrounding mountains, valleys, or plains.
- Describe the soil types in everyday terms, such as rocky, clayey, or loamy soils that might be present at the site.
- Point out indicators of soil quality, such as the growth of local vegetation or visible erosion, which may be significant depending on the topography.
- Discuss whether the soil is fertile enough for local agriculture and other activities.
- Address any known erosion issues or landslide-prone areas relevant to the proposed site.

Hydrology:

- Discuss the presence of major water bodies/beels/rivers near the proposed site, such as rivers, lakes, or ponds.
- Mention water-related issues like areas prone to waterlogging during the monsoon or potential drought conditions in the dry season.
- Include how locals utilize these water resources, especially in the context of farming, drinking, or any other local activities.

Flora:

- Discuss common plants and trees at the proposed site, like any native species that might be prominent in the area.
- Highlight useful plants, such as those used for traditional medicine, food, or local construction materials.
- Include plants that are significant to the culture or traditions of the communities near the proposed site.

Fauna:

- Describe animals common to the proposed site, such as local birds, mammals, reptiles, or other wildlife.
- Mention animals that are economically important, like livestock (e.g., goats, sheep) raised by the local communities.
- Highlight any rare or potentially rare wildlife at the proposed site and how locals coexist with these species.

Ecosystems and Habitats:

- Explain the location of key ecosystems within the proposed site, such as forests, grasslands, or wetlands.
- Describe the appearance and characteristics of these ecosystems, noting whether they are dense, open, wet, or dry.
- Mention how people use these areas, whether for grazing, collecting firewood, or other traditional activities.

Demographics:

- Provide details on the population distribution near the proposed site, contrasting between smaller villages and larger towns.
- Describe the local languages spoken, dominant religions, and cultural practices typical of the region surrounding the proposed site.

 Mention any special population groups, such as indigenous communities or the elderly, who hold significant roles in local traditions.

Economic Activities:

- List common economic activities near the proposed site, such as agriculture, tourism, and small-scale retail.
- Include information on local products like traditional handicrafts or agricultural produce and how they are traded within the region.
- Mention any seasonal work that is prominent near the proposed site, such as tourism during the summer or agricultural labor linked to the monsoon.

Social Infrastructure:

- Describe the availability and condition of basic services like schools, health clinics, and markets near the proposed site.
- Mention the travel distance and road conditions required to reach these services, particularly given any challenging terrain.
- Highlight community centers, temples, and other religious buildings where locals gather for social and cultural activities.

Cultural and Heritage Sites:

- Provide details about local festivals, rituals, or events held at cultural or heritage sites near the proposed site.
- Mention traditional crafts, music, or stories that are part of the cultural heritage of the area.
- Describe how these sites are maintained and celebrated by the local community, emphasizing their significance in preserving the cultural identity of the area around the proposed site.

Note: Graphs, tables, and maps in the baseline IEE serve to effectively present and communicate complex data about the study area's current conditions. These enhance clarity and comprehension by simplifying information, visualizing data trends, organizing and summarizing large volumes of data, and providing geographical context. These tools support analysis, highlight critical issues, and aid in comparing pre-project and post-project scenarios. Thus, graphs, tables and maps can be used wherever necessary.

Attachment 2 of Annexure 6: Outline for Environment Management Plan

The level of detail of an environment management plan (EMP) shall reflect the level of anticipated risks. The following information will be included in the EMP. The sample format is also applicable as a corrective action plan for existing facilities within subprojects.

| Project Component/ Activity | Environmental Components or Issues | Description of Environmental Impact | Mitigation Measure | Supervision/ Responsibility | Cost of implementation |
|-----------------------------------|--|---|---|---|------------------------|
| | RUCTION PHASE | | | | |
| | Biodiversity (both flora and fauna Soil erosion | Loss of floral and faunal species such as birds (avifauna) as their habitat may get disturbed along with the felling of trees. Loss of topsoil, disturbance to landscape, land degradation and visual impacts. | plantation at project site for development of green belt. Grass turfing to avoid soil erosion once construction work is over | contractor to implement CPIU to monitor | |
| | Greenhouse gas emission | Emission from vegetation burning (if any) | Tree transplantation should be carried out as far as possible. In case such option is nonfeasible, then dead plants should be bio-degraded at site. | | |
| | | | | | |
| CONSTRUCT | ION PHASE | | | | |
| | | | | | |
| OPERATION | PHASE | <u> </u> | | | |
| | | | | | |
| | | | | | |

Annexure 7: Environmental Due Diligence Report

Note: This outline may serve as an outline for the environmental audit report for existing facilities. If the subproject with an existing facility is categorized as B, the environmental audit report shall be appended to the IEE.

- **A. Executive summary.** This section provides an overview of the subproject, its potential environmental impacts, and mitigation measures. It serves as a reference for stakeholders and regulatory bodies, ensuring transparency and accountability. Not more than 1 page.
- **B.** Description of the subproject. This section delineates the proposed subproject and its principal components. It typically includes drawings and maps illustrating the layout and components of the subproject, the subproject site, and the subproject's area of influence. The business proposal shall serve as a valuable source of information for this section.
- C. Audit and Site Investigation Procedure, and Areas of Concern (only for existing facilities). Refers to the process of evaluating the environmental and operational performance of a facility. This section describes the procedures for conducting inspections, and reviewing documentation, and assessing compliance with relevant environmental regulations and standards as performed by the PMU and/or PIU. This section describes areas where there is need to improve existing facilities and activities with respect to environmental safeguards. Not more than 3 pages.
- **D.** Results of the environmental screening and categorization. Describe the findings of the environmental screening checklist (i.e. Annexure C3 and C4), and indicate why the subproject has minor or no environmental impact. Not more than 1 page.
- E. Attach the accomplished screening checklist at Annexure to the report.
- **F.** Compliance checklist. Provide details all applicable environmental regulations and standards required by the government due to the subproject's components and activities. The subproject proponent should comply with local, regional, and national laws, helping avoid legal issues and ensuring regulatory compliance.
- **G. Site-specific management plans.** The EMP and/or CAP will provide tailored strategies for managing unique environmental issues at a project site. They address specific conditions or practices, ensuring effective mitigation of site-specific impacts.
- **H. Reporting procedure.** This will indicate the process designed to monitor, document, and communicate the environmental performance the subproject as per the EMP and/or CAP and compliance with government policies. This procedure ensures transparency, regulatory compliance, and continuous improvement in environmental management. Not more than 1 page.

Annexure 8: Outline of Annual Safeguard Report

To be submitted by the PIU to PMU

Please include additional sheets or attachments as required to provide details.

| Name of Region | | |
|---------------------------|-------|-------|
| Completed by (name): | | |
| Position in organization: | | Date: |
| Reporting period | From: | To: |

A) Subprojects processed under the Fund during the reporting period

| Name of Subproject | Sub /sector | Tenor of Grant | amount | Safeguard Category | | • | | _ | | ENV, IR or IP issues | Status (approve, | Reasons for |
|-----------------------|----------------|-------------------|----------------|-----------------------|--|---|-------------------------|-----------------------|---------------------|-------------------------|------------------|----------------|
| | | (Months) | (,000 US\$) | Env | | | and actions taken | revise, or reject) | revise or reject | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

ENV = environment, IR = involuntary resettlement, IP = indigenous peoples.

B) Subprojects Using ADB Funds

| Name of Sub-borrower and subproject: | |
|---|--|
| Subproject location: | |
| Industry sector: | |
| Value of exposure (US\$ million): | |
| Safeguard category: | Environment: Involuntary Resettlement (IR): Indigenous peoples (IP): |
| Any safeguard due diligence in any subproject approved? If yes, is it desk review of safeguard documents, and/or field visit, and by whom and when? | |

^a Please use the sectors listed in the earlier table or any standard classification.

| Any environmental assessment report (including EMP), IR plan, or IP plan, or audit reports reviewed by PMU? If yes, please provide the names of documents reviewed. | |
|---|--|
| What were the main environmental, IR and IP issues associated with this subproject, and how were the issues dealt with? | |
| Does the subproject(s) comply with applicable domestic and ADB safeguard requirements? Any incidents of non-compliance? Please describe how PMU ensured subproject safeguard compliant. | |
| How PMU monitor the sub-borrower and its subproject's performance? Please describe supporting docs such as safeguard monitoring reports. | |

C) Additional information for the reporting period

- Please provide the number of subprojects where a field visit was conducted to review aspects including safeguard issues.
- Please provide details of any accidents/ litigation/complaints/regulatory notices and fines, their causes and corrective actions being taken.
- Please state any difficulties related to the ESMS implementation. What are the possible causes and actions being taken by the PMU? What are the recommendations of ADB's mission?.

Annexure 9: Sample Grievance Registration Form

| Thequeries and comments regarding project in | Projeomplementation. W | | | |
|--|------------------------|-----------------------|----------------|---|
| to provide their name and contact informat | | | | |
| and feedback. Should you choose to incli | | | | |
| remain confidential, please inform us by | | | | |
| Thank you. | | | ,, | , |
| Date | | Place of registration | | |
| Contact Information/Personal Details | | | | |
| Name | | Gender | Age | |
| Home Address | | - Jonasi | 7.90 | |
| Place | | | | |
| Phone Number | | | | |
| E-mail | | | | |
| Complaint/Suggestion/Comment/Question | <u> </u> | | | |
| Please provide the details (who, what, where | | grievance bel | ow | |
| | , , | • | | |
| | | | | |
| | | | | |
| How do you want us to reach you for feed | back or update or | n your comm | nent/grievance | ? |
| FOR OFFICIAL USE ONLY | | | | |
| Registered by: (Name of Official registering g | grievance) | | | |
| | | | | |
| Mode of communication: Note/Letter Email | | | | |
| Verbal/Telephonic | | | | |
| Verball religionis | | | | |
| Davisuad by (Names/Davitians of Official/a) | | | | |
| Reviewed by: (Names/Positions of Official(s) | reviewing grievand | e) | | |
| Action Taken: | | | | |
| ACTION Taken. | | | | |
| Whether Action Taken Disclosed: | Yes | | | |
| Means of Disclosure: | | | | |
| | | | | |