

DAM REHABILITATION AND IMPROVEMENT PROJECT (DRIP) PHASE II

(Funded Jointly by World Bank & AIIB)

KUTTIYADI AUGMENTATION DAM & SPILLWAY (PIC: KL29HH0044 & KL29HH0056)



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

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ACRONYMS

| | |
|--------|---|
| AIDS: | Acquired immune deficiency syndrome |
| BCMP: | Biodiversity Conservation and Management Plan |
| BOCW: | Building and Other Construction Workers |
| CCA: | Culturable Command Area |
| COVID: | Corona Virus Disease |
| CoC: | Code of Conduct |
| CPCB: | Central Pollution Control Board |
| CPR: | Cardio Pulmonary Resuscitation |
| CPMU: | Central Project Management Unit |
| CWC: | Central Water Commission |
| DCP: | Dry Chemical Powder |
| DDMA: | District Disaster Management Authority |
| DG: | Diesel Generator |
| DRIP: | Dam Rehabilitation and Improvement Project |
| DSRP: | Dam Safety Review Panel |
| EAP: | Emergency Action Plan |
| EHS: | Environment Health and Safety |
| EMC: | Engineering and Management Consultant |
| ESCP: | Environment and Social Commitment Plan |
| ESDD: | Environmental and Social Due Diligence |
| ESF: | Environmental and Social Framework |
| ESHS: | Environmental, Social, Health and Safety |
| ESI: | Employee's State Insurance |
| ESIA: | Environmental and Social Impact Assessment |
| ESMF: | Environmental and Social Management Framework |
| ESMP: | Environmental and Social Management Plan |
| ESS: | Environmental and Social Standard |
| GBV: | Gender Based Violence |
| GRM: | Grievance Redressal Mechanism |
| HIV: | Human immunodeficiency virus |
| IA: | Implementation Agency |
| IEC: | Information Education and Communication |
| IFC: | International Finance Corporation |
| KSEBL: | Kerala State Electricity Board Limited |
| LMP: | Labour Management Procedure |
| LPG: | Liquefied Petroleum Gas |
| NDMA: | National Disaster Management Authority |
| NGO: | Non-Governmental Organization |
| OHS: | Occupational Health & Safety |
| PDO: | Project Development Objective |
| PF: | Provident Fund |
| PIU: | Project Implementation Unit |

| | |
|---------|--|
| PPA: | Power Purchase Agreement |
| PPE: | Personal Protective Equipment |
| PPEQMP: | Pollution Prevention and Environment Quality Management Plan |
| PST: | Project Screening Template |
| PUC: | Pollution Under Control |
| QPR: | Quarterly Progress Report |
| RTI: | Right to Information |
| SCADA: | Supervisory Control and Data Acquisition |
| SDMA: | State Disaster Management Authority |
| SEAH: | Sexual Exploitation, Abuse and Harassment |
| SEF: | Stakeholder Engagement Framework |
| SEP: | Stakeholder Engagement Plan |
| SOP: | Standard Operating Procedure |
| SPMU: | State Project Management Unit |
| ST: | Schedule Tribe |
| TDP: | Tribal Development Plan |
| WB: | World Bank |
| WBG: | World Bank Group |
| WBGEHS: | World Bank Group's Environment Health and Safety |
| WRD: | Water Resources Department |

CHAPTER 1: PROJECT OVERVIEW AND FINDINGS OF ESDD

1.1 PROJECT OVERVIEW

The proposed Dam Rehabilitation and Improvement Project (DRIP II) would complement the suite of ongoing and pipeline operations supporting India's dam safety program. The project development objective (PDO) is to increase the safety of selected dams in participating States and to strengthen dam safety management in India. Project Components include:

- Component 1: Rehabilitation and Improvement of Dams and Associated Appurtenances (US\$ 577.14 million);
- Component 2: Dam Safety Institutional Strengthening (US\$ 45.74 million);
- Component 3: Incidental Revenue Generation for sustainable operation and maintenance of dams (US\$ 26.84 million);
- Component 4: Project Management (US\$ 68.13 million).
- Component 5: Contingency Emergency Response Component (US\$ 0 million).

The project is likely to be implemented for 300 dams in 18 states across the country. The primary beneficiaries of the project are the communities that live in dam breach flood inundation areas and the communities that depend on water, irrigation and electricity services provided by the dams that could be compromised by poor dam performance or failure. In addition to saving lives, improved dam safety will avoid potential flood damage to houses, farm areas, infrastructure (roads, bridges, other public and private infrastructure) and industrial and commercial facilities. Improved dam safety will also reduce the likelihood of service interruptions due to dam failure as well as potentially improving dam service provision, overall efficiency and storage capacity, including during drought periods.

1.2 OBJECTIVE AND CONTEXT OF ESMP

A project level ESMF has been prepared and disclosed. In compliance with the ESMF, Environmental and Social Due Diligence has been carried out employing E&S risk screening templates. ESMF mandates that for all Low and Moderate Risk projects, a standard ESMP shall be prepared, which will be updated based on the sub project specific activities. Accordingly, Standard ESMP is prepared describing the process to manage the impacts identified during the ESDD. The ESMP also determines the implementation schedule, roles and responsibilities, reporting and monitoring requirements. The management plans included in this ESMP outline the environmental and social mitigation measures and management controls to be implemented in compliance with the E&S commitments.

This ESMP is a live document and is subjected to periodic review and updates. The Implementation Agency and contractors are primarily responsible for the implementation of the ESMP. Environmental and social management plans covering various phases, prepared as part of this ESMP shall be updated in line with the dynamics of project progress and stakeholder engagement inputs. If during the operationalization of this ESMP, new conditions emerge and risks and impacts differ from that identified in the ESDD, a new ESMP may be prepared adapting to the new conditions.

1.3 SUB PROJECT DESCRIPTION

The Kuttiyadi Augmentation Dam (KA Dam) is constructed across Karamanthode, a tributary of Kabani River at Padinjarethara, Wayanad District as part of Kuttiyadi Hydro Electric Project (KHEP). The project aims to divert the utilisable inflow of Karamanthode at Padinjarethara to Kakkayam reservoir in Kuttiyadi River basin to improve the water availability of Kakkayam reservoir and thereby to enhance the power generation from KHEP. It is an earth dam. Excess inflow to the reservoir is regulated by releasing to downstream Kabani basin through a spillway structure provided on the right flank away from the earth dam. The project lay out is shown in the Figure 1.1 and. Salient features of the project are given in the Table 1.1.

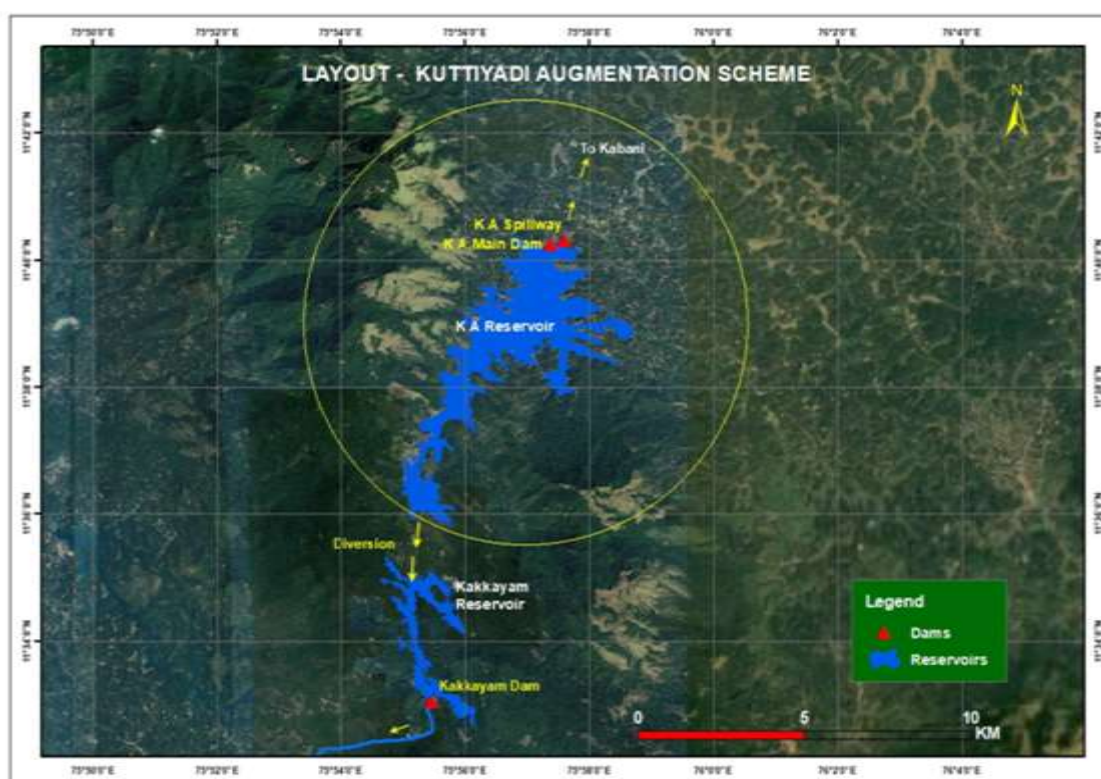


Figure 1.1: Project Layout

Table 1.1: Salient features of the project

| | |
|--------------------------|---|
| Location | |
| State | Kerala |
| District | Wayanad |
| River/ Basin | Karamanthode, Kabani |
| Nearest city and airport | Kozhikode, Calicut International air port |
| Nearest railway station | Kozhikode |
| Lat/Long | 11 ^o 40' 15'' N /75 ^o 57' 21''E |
| Type of project | Hydropower |
| Installed Capacity (MW) | 231.75 MW |
| Dam Details | |

| | |
|--|---|
| Type | Earth |
| Total length of dam | 685 m |
| Top width of Dam | 7 m |
| Elevation of top of dam | + 778.5 m |
| Height of Dam above deepest foundation level | 38.5 m |
| Outlets | Two outlets are provided in spillway dam. |
| Number | 2 |
| Outlet 1 | |
| Elevation | +749.75 m |
| Size | Dia. 2m |
| Outlet 2 | |
| Elevation | +758.00 m |
| Size | Dia. 2m |
| Spillway | Spillway is constructed as a separate concrete structure away from the earth dam. |
| Type of Spillway | Ogee |
| Spillway Crest Level | + 767.00 m |
| Number of Bays | 4 |
| Type of Spillway Gate | Radial gates |
| Size of Spillway Gate | 10.97m X 9.2 m |
| Discharging Capacity at FRL | 1664 cumec |
| Reservoir | |
| Catchment Area at Dam site | 61.44 sq. km |
| Full Reservoir Level | +775.60 m |
| Minimum Draw Down Level | +754.86 m |
| Gross Storage Capacity | 209.18 MCM |
| Reservoir Spread Area | 12.77 sq.km |
| Date of Completion | 2004 |

1.4 PROPOSED INTERVENTIONS/ ACTIVITIES AND INTENDED OUTCOMES

Dam Safety Review Panel (DSRP) constituted for DRIP Phase II, has made a visit to Kuttiyadi Augmentation Dam on 05.09.2020 and recommended measures to be taken to improve the safety and performance of dam and associated appurtenances in a sustainable manner, and also to strengthen the dam safety institutional set-up.

The objectives of the project are to be achieved through investments for physical and technological improvement activities, managerial upgrading of dam operations, management and maintenance, with accompanying institutional reforms. The project will improve the safety and operational performance of dam and mitigate risks to ensure safety of downstream population and property. The following rehabilitation proposals as described in the Project Screening Template have been formulated based on DSRP recommendations and these proposals form the basis for preparation of the present ESMP.

Major rehabilitation works proposed include;

A. Structural Rehabilitation Works

1. Repairs to surface drain and protective works to the downstream slope of dam near the confluence of toe drain.
2. Extension of Parapet wall near the left bank up to left abutment.
3. Clearing downstream of spillway channel and construction of retaining wall to protect the left bank in continuation with the existing training wall at Spillway Dam.
4. Maintenance to Spillway Radial Gates & Hoist mechanism.
5. Roofing to hoist mechanism of Radial Gates.
6. Maintenance to vertical gate

B. Non-Structural Measures

1. Preparation of Tier II EAP of Dam
2. Installation of Early Warning System

C. Basic facilities enhancement

1. Construction of Access Road to the right bank of spillway dam
(An access road of length 400 m approx. is proposed to be constructed to access the non-overflow portion of the spillway structure through the available KSEB land. The work includes earthwork, providing wet mix macadam, providing 20mm thick open-graded Premix Carpet using Bituminous Binder and seal coat as top surface.)
2. Extension of Security fencing on the right bank of Spillway Dam
(It is proposed to provide Security fencing for a minimum periphery in the close premises of spillway structure to prevent unauthorized entry using G.I. chain link with M.S. Angle iron posts)
3. Construction of office cum staff dormitory building
(It is proposed to construct a two storey building with a built up area of 500 Sq.m. approx. within the Dam colony, as office cum staff dormitory building for the functioning of Dam Safety Division and subordinate offices and for the accommodation of officials).

D. Instrumentation

1. Installation of Automatic Water Level recorders

E. Other activities

1. Preparation of contour drawings of the area downstream of the toe of the dam including stream downstream up to the confluence of spill channel.
2. Pressure washing downstream portion of the non-overflow portion of Spillway dam.
3. Investigation of cause of boil in the toe drain
4. Profile survey of earth dam
5. Back water studies to ascertain extent of flooding near the toe of KA Main dam consequent to varying spillway releases
6. Hydrographic Survey
7. Estimation of Site-Specific Seismic Parameters and Evaluation of Structural Safety of the Dam
8. Monitoring & controlling of flood water levels in the downstream reaches of spill channel
9. Developing Project Specific Unit Hydrograph for Inflow Forecasting
10. Detailed investigation to find out the causes of seepage through diaphragm wall between the service and emergency gates of control shaft with the assistance of expert agencies
11. Preparation of As-built drawings
12. Testing of materials

Scope of ESMP for various contractors:

The applicability of scope of ESMP to various contract agencies would be as per the official scope of work defined in the signed contract agreement.

1.5 ESDD FINDINGS AND KEY IMPACTS TO BE ADDRESSED

ESDD has been carried out considering the above proposals/interventions. The screening and site assessment exercise has identified the nature of risk and impacts, with level of risk and the outcomes are documented in ESDD report.

As per the ESDD outcome, risk/impacts that have been identified relate to Water Quality, Physical Environment, Ecology, OH&S, labour and SEAH/GBV. Environment risks of air, water, noise, land use, soil and resource use due to clearing downstream of spillway channel and construction of retaining wall to protect the left bank in continuation with the existing training wall at Spillway Dam, Construction of Access Road to the right bank of spillway dam, Extension of Parapet wall near the left bank up to left abutment. Construction of an office cum staff dormitory, Maintenance to Spillway Radial Gates & Hoist mechanism, Roofing to hoist mechanism of Radial Gates, Maintenance to vertical gates, Extension of Security fencing on the right bank of Spillway Dam, Pressure washing downstream portion of the non-overflow portion of Spillway dam is considered Low to Moderate. Similarly, environment and social risk of labour camp and disposal of debris has also been identified as Moderate. Risk of all other activities has been identified as Low. These risks are low to moderate and localised, short term and temporary in nature. Hence the overall risk of this sub-project dam is categorized as Moderate.

As per ESMF, Occupational Health and Safety (OH&S) risk is envisaged across the project interventions / dams, a separate OHS plan in accordance with WBG Environmental Health and

Safety (ESHS) Guidelines and Good Practice Note on Environmental, Health, and Safety approaches for Hydropower Projects (2018) shall be applicable to all sub-projects. Hence it was not being considered under screening criteria. Occupational health and safety is considered an important requirement and shall be managed as per OHS plan and will be part of Contractor's ESMP.

Based on ESDD findings, WB Environmental & Social Standards (ESS) applicability analysis and recommended management plan is given at Table 1.1.

Table 1.1 WB-ESS Applicability Analysis and Recommended management plan

| WB-ESS | Recommended Management Plan | Applicability |
|---|--|----------------------|
| ESS1: Assessment and Management of Environmental and Social Risks and Impacts | Gender Based Violence or SEA/SH related actions | Applicable |
| ESS2: Labour and Working Conditions | Labour Management Procedure including Occupational health and Safety | Applicable |
| ESS3: Resource Efficiency, Pollution Prevention and Management | Pollution Prevention and Environment Quality Management Plan including Debris Management | Applicable |
| ESS 4: Community Health and Safety | Community Health and Safety Plan | Applicable |
| ESS 10: Stakeholder Engagement Plan | Stakeholder Engagement Plan | Applicable |

The above recommended plans are discussed in detail in Chapter 2.

CHAPTER 2: ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS

The E&S management plans prepared for the risks and impacts identified as part of ESDD are presented hereunder. Each plan includes mitigation measures specific to the risks and impacts and where applicable, sets out the framework for other plans and procedures to be developed later in the Project. Construction contractors will develop and implement their own site-specific C-ESMPs.

2.1 GENDER BASED VIOLENCE OR SEA/SH RELATED ACTIONS (ESS1)

The following key actions are to be ensured during implementation:

| S. No. | Key Action to address GBV/SEA/SH Risks | By Whom |
|--------|--|--|
| 1 | Clearly define SEA/SH requirements in Bid-documents and also the requirement for a CoC which addresses SEA/SH, using Standard WB procurement documents | SPMU |
| 2 | Operationalize or constitute Internal Complaints Committee as per Prevention of Sexual Harassment at Workplace procedure | SPMU |
| 3 | Implement appropriate project-level activities such as: separate, safe and easily accessible facilities for women and men in the place of work and the labour camps. (e.g. toilets should be located in separate areas, well-lit) display signs that the project site is an area where SEA/SH is prohibited. | Implementation by Contractor / GBV Focal Point at SPMU & overall supervision by Engineer in Charge |
| 4 | Ensure Codes of Conduct are clearly understood and signed by those with a physical presence at the project site; Train project staff on the behaviour obligations under the CoCs and Disseminate CoCs (including visual illustrations) and discuss with employees and local communities. | Engineer in Charge Contractor |
| 5 | Undertake regular M&E of progress on SEA/SH prevention and response activities, including reassessment of risks as appropriate. | GBV Focal Point at SPMU/IA |

Implementation costs would include: preparation of sign boards, posters, conducting of awareness trainings by Implementing Agency and also by Contractor.

2.2 LABOR MANAGEMENT PROCEDURE (ESS2)

2.2.1 Overview of labor use in the project

Number of Project Workers: Approximately 20 workers at different points of time (Direct workers, Contracted workers and Community workers) shall be engaged for the rehabilitation works

Characteristics of Project Workers: As per the proposed execution strategies for all Low to Moderate risk sub-projects, the following categories of project workers are identified:

- i) Direct workers – all the existing dam site officials including those sent on deputation from other departments involved in the project activities;

- ii) Contracted workers – Workers engaged by the Contractors undertaking rehabilitation works. This include Skilled and semi-skilled Migrant workers engaged for specialized tasks etc.
- iii) Community workers (or volunteers particularly for EAP).

Timing of Labor requirements: See Table below:

| S.No. | Type | Numbers | Locations | Duration | Skills required |
|-------|------------------------------------|---------|---|--------------------------------|--------------------------------|
| 1 | Direct Workers (Project officials) | 2-4 | Dam site | Throughout | Executive and Supervisory |
| 2 | Contracted Workers | 15-20 | Dam site | 21 months | Varied (skilled, semi-skilled) |
| 3 | Community Workers | 5-10 | Villages/areas in the vicinity of the dam | Only during EAP implementation | Community facilitation skills |

Hence as per WB’s guidance note¹, for such workers, Contractor needs to prepare detailed profile of Workforce as per table below:

| Key work activities | Schedule for such activities | Duration of contract | Rotation | Place of residence | | |
|---------------------|------------------------------|----------------------|----------|------------------------|------------------------|---------|
| | | | | workers from community | Within local community | On site |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Labour Camp: It is proposed to establish minimum three number of labour camps, with proper sanitation systems, in the Project colony. Existing quarters in the Project colony can be spared for setting up the labour camps.

2.2.2 Assessment of Key Potential Risks

Labour related risks would include:

- Safety issues while at work like injuries/accidents/ fatalities, Occupational health and safety risks due to exposure of workers to unsafe conditions while working at heights, working using lifts, handling of equipment and machinery, exposure to air and noise pollution etc. will be addressed through OHS guidelines.
- Short terms effects due to exposure to dust and noise levels, while at work
- Inadequate accommodation facilities for labour, including inadequate sanitation and health facilities
- Discrimination in Employment (e.g. abrupt termination of the employment, working conditions, wages or benefits etc.)
- Sexual harassment at work

¹ESF/SAFEGUARDS Interim Note: COVID-19 consideration in constructions/civil works projects

- Absence or inadequate or inaccessible emergency response system for rescue of labour/workforce in situations of natural calamities.
- Health risks of labour relating to HIV/AIDS and other sexually transmitted diseases
- Non-payment of wages
- Unclear terms and conditions of employment
- Discrimination and denial of equal opportunity in hiring and promotions/incentives/training opportunities
- Denial for workers' rights to form worker's organizations, etc.
- Absence of a grievance mechanism for labour to seek redressal of their grievances/issues

2.2.3 Responsible staff

See Table below for list of key activities with responsibilities:

| S. No. | Activity | Responsibility |
|--------|--|-----------------------------------|
| 1 | Engagement and Management of Contractors | SPMU, KSEBL |
| 2 | Engagement and Management of Sub-Contractors | Contractor |
| 3 | Occupational Health and Safety (OHS) | Engineer-In-Charge |
| 4 | Training of Workers | Engineer-In-Charge |
| 5 | Addressing worker grievances | Contractor (with oversight by IA) |

2.2.4 Policies and procedures

These are listed below under the following sub-headings: i) Incidents and Accident Notification; ii) GBV/SEAH related iii) Occupational Health and Safety; and iv) COVID considerations.

- i) **Incidents and Accident Notifications:** The contractor will promptly notify to the IA/SPMU within 24 hours any major incident or accident having significant impact on the environment, tangible cultural heritage, communities, the public or workers. They will provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and including information provided by any contractor and supervising entity. Further the SPMU will apprise this to CPMU and WB.
- ii) **GBV/SEAH related:** More than 95% of the contract labour is expected to be men, and women's participation as contract labour or community labour is going to be very low. Contractors will need to maintain harmonious relations with local communities by ensuring labourers/workers adhere to Code of conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC will be written in plain language and signed by each worker to indicate that they have:
 - received a copy of the CoC as part of their contract;
 - been explained the CoC to them as part of induction process;
 - acknowledged that adherence to this CoC is a mandatory condition of employment;
 - understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

To mitigate potential risks related to on-site safety and GBV, the Contractor/ will undertake actions as given in Table below:

| S. No. | Action | Timelines |
|--------|---|--------------------------------|
| 1 | Separate, safe and easily accessible facilities for women and men in the place of work and the labour camps. (e.g. toilets should be located in separate areas, well-lit) | Throughout construction period |
| 2 | Display signs that the project site is an area where SEA/SH is prohibited. | Throughout construction period |
| 3 | Ensure Codes of Conduct are clearly understood and signed by those with a physical presence at the project site; | Upon joining |
| 4 | Train project staff on the behavior obligations under the CoCs and disseminate CoCs (including visual illustrations) and discuss with employees and local communities. | Periodic; every six months |

iii) Occupational Health and Safety:

IA is committed to:

- Complying with legislation and other applicable requirements which relate to the occupational health and safety hazards.
- Enabling active participation in OH&S risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
- Continually improving the OH&S management system and performance.
- Communicating this policy statement to all persons working under the control. of IA with emphasis on individual OH&S responsibilities.
- Availing this policy statement to all interested parties.

To avoid work related accidents and injuries, the contractor shall ensure following Do's and Don'ts at site will:

- **Pre employment Health Check up:** Ensure that health of each worker is checked and health record is maintained before deputing them to work.
- **Deployment of EHS officer :** Designate a person responsible for OHS who is fully acquainted with handling of OHS issues
- **Induction training:** Ensure that every workers is given OHS orientation training which will include use of PPE, first aid, use of fire extinguishers, action to be taken in case of accidents, caution to be exercised during working at height or confined areas, respecting system and procedures evolved at site for safe working. Training shall create enough awareness amongst workers so that they take reasonable care to avoid acts or omissions that are likely to result in injury to self, or the other workers/and other people.
- **First Aid:** Ensure that first aid box is provided at each workplace with easily identifiable location. Few workers shall be trained as first aider including in CPR techniques.
- **PPE:** Ensure availability of PPE. helmet, boot, earplug (for noisy areas) , mask for dusty areas, gloves, safety belt and safety jacket.
- **SOPs:** Define SOPs (standard operating procedures) for Working at height or confined areas which will include minimum two persons working, one at work and another standby as rescuer.
- **Ventilation :** Maintain adequate ventilation at confined areas and at workplace.

- **Illumination** : Maintain adequate illumination at all workplaces.
- **Electric Hazards** : Prevent exposure to electrical hazards.
- **Fire Protection**: Ensure adequate fire extinguisher (as per type of fire hazard viz A, B, C) are placed at workplace.
- **Dust Control** : Ensure that workers are not exposed to high dust and noise level which can affect their health. Use dust suppressing system like water sprinkling and muffler or acoustic enclosures for noise generating system.
- **Gas Cylinder handling**: Acetylene and oxygen/gas cylinders shall be handled using trolley where these cylinder are securely separated with each other for its safe use.
- **Drinking Water and Sanitation**: Ensure that safe drinking water is available at each work site. Also mobile toilets fitted with anaerobic sewage treatment system are provided at each work site.
- **Barricading and securing the work areas**: Each hazardous work area, if any, have safety barricading depending on nature of hazard viz trip, fall danger, restricted entry area, electrical hazard.
- **Safety Signage and Mock Drill**: Place adequate safety caution and signage in local languages for awareness to workers. Also conduct periodic mock drill.
- **Back-up Medical facility**: identify and tie up with equipped hospital(s) capable of providing ambulance and medical facilities or handling major injuries.
- **Accident Reporting Analysis and Prevention**: Identify the reportable accidents², analyse the cause of each reportable accident, maintain the record with analysis and take corrective action based on cause analysis for prevention of such accidents in future.
- **Caution from Covid-19 scenario**: Provide multiple entries for workers to avoid crowding depending upon site condition. Ensure that physical distancing is maintained as far as possible at workplace. Each workers shall be provided with face mask.
- **Compliance to law**: Ensure those legal requirements are followed like restriction on use of Child labour etc.

DON'T

- Do anything which may leads to risk to established health, safety and wellbeing rules or relevant health, safety and wellbeing regulatory requirements.
- Jeopardise mental and physical well-being or that of people you work with by, for example, imposing unreasonable deadlines or regularly demanding longer working hours.

Further to enforce the compliance of environmental management, contractors will be responsible and liable for safety of site equipment, labours and daily workers attending to the construction site and safety of citizens for each work site, as mandatory measures.

Occupational Health and Safety Monitoring

OHS compliance monitoring will be carried out by designated E&S Expert every month. Contractor will provide compliance in initial report to Engineer in charge and thereafter submit a compliance report every 3 months. Following shall be covered as part of OHS monitoring:

²An accident which causes death or which causes any bodily injury by reason of which the person injured is prevented from working for a period of forty-eight hours or more immediately following the accident (as per Building and Other Construction Workers Act, 1996)

- Health check-up records of workers, as applicable.
- Accident hot spots on transport route, if any
- Training and awareness of labour – OHS, Emergency Management, Use of PPEs
- Identification of hazardous working locations and marking
- Emergency response procedure
- Availability of PPEs – types, numbers
- Accident reporting

Communication and Consultation (Workers)

Workers consultation will be regular features. However, this aspect shall be as per consultation process defined under other plans and ESS4.

Training and Records

Contractor will provide training to all workers before start of work and thereafter every three months. He will maintain training records and share the details with E&S experts of the dam as part of his quarterly progress report. The training should cover the following:

- General awareness about the site, type of works to be carried out and risks involved
- Use of appropriate PPEs for different types of works including dust masks and ear muffs
- Following work instructions for hazardous/risky operations as marked on site
- How to act during emergency including basic rescue operations and accident reporting
- Location of first aid boxes and fire extinguishers and how to use them
- Handling of gas cylinders

Emergency Preparedness and Management

Emergency Preparedness and Management Plan shall be followed as given under ESS 4

Reference to World Bank Group –(WBG) Environmental Health and Safety (EHS) and Other Guidelines

The WBG Guidelines of Environmental Health and Safety (WBGEHS) provide detailed guidance note on health and safety requirement and good practices. The WBGEHS guidelines are intended to be used in conjunction with Indian legislation on OHS at construction sites and shall be referred by contractor and IAs while finalizing site specific contractor's EHS management plan.

iv) Workforce Details:

Influx of Migrant Labour is likely as there will be a need to perform high skilled jobs which may not be available locally or even within the state. These are likely to come from other states or adjoining states or districts. Possibly 3-5 persons are required for highly skilled jobs. The remaining – semi-skilled and unskilled labor will be sourced from within the district. The Contractor needs to prepare detailed profile of Workforce as per table below;

| Key work activities | Schedule for such activities | Duration of contract | Rotation | Place of residence | | |
|---------------------|------------------------------|----------------------|----------|------------------------|------------------------|---------|
| | | | | workers from community | Within local community | On site |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

2.2.5 Age of employment

The minimum age of employment for this project shall be 18 years and to ensure compliance, all employees will be required to produce aadhar card or any other valid proof of age. If any contractor employs a person under the age of 18 years, that contractor will not only be terminated by IA but also be reported to the authorities.

2.2.6 Terms and conditions

Terms and conditions for three types of workers are presented below:

- i. The Direct Workers (Dam officials, government officials) are governed by their employment agreements with the parent Department
- ii. Contract Workers: Contractor shall comply with the most current Regulation of Wages for the Building and Construction Industry which is issued by the Government and reviewed on a regular basis. The Minimum Wage Act specifies the minimum wages, hours of work, overtime pay, leave entitlements, travelling and Subsistence Allowances and the issue of protective clothing. Before a contract is awarded, contractor is required to certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favourable than those contained in the most current wages regulation issued by the Labour Commissioner. Where a contractor fails to comply with this requirement, the contract with the contractor may be withdrawn as an approved contractor upon recommendations of the Labour Commissioner.

In ensuring full compliance with the law in this regard, contractors will be required to furnish with copies of the labour license and/ or copies of contract of all its workforce. As a monitoring mechanism, a contractor shall not be entitled to any payment unless he has confirmed that all employment conditions of the contract are being complied with. The IA would intervene if the contractor defaults in the payment of wages due to any of its employees.

‘Community Workers’ is further detailed in following sections.

2.2.7 Grievance Mechanism

The Grievance Mechanism for Workers will be organised as follows.

- i. **Direct Workers (Project Officials):** The Executive Engineer, Dam Authority, will be responsible for providing guidance and advice on all worker related grievances and their redressal, in line with the state and national legislation and the LMP.

- ii. **Contract Workers:** While the Contractor will have his own GRM, the IA (Water Resources Department will have oversight) and the overall responsibility for ensuring the establishment and implementing the GRM for project workers. In this regard, the Executive Engineer will be responsible to ensure that the Contractor has established and operationalised the contract workers grievance redress mechanism. In this, Contractor will be supported by Environment and Social nodal officers by IA designated for the purpose. S/he will also be responsible for tracking and resolving workers grievances. S/he shall maintain records where grievances and complaints, including minutes of discussions, recommendations and resolutions made, will be recorded.
- iii. **Community Workers:** The Executive Engineer, Dam Authority, will be responsible for providing guidance and advice on all community worker related grievances with this LMP.

The designated Social Expert in SPMU will provide overall implementation and capacity building support on resolving all workers grievances and will support the Executive Engineer in this regard. S/HE will also include workers grievance status in the progress report. Grievances will continue to be received through established communication channels. Workers will also be able to submit their grievances through the district Labour Department, whose contacts will be shared with all the contractors and worksites.

2.2.8 Contractor Management

IA will ensure that contractor monitor, keep records and report on terms and conditions related to labour management. The contractor must maintain records with evidence of all payments made, including social security benefits, pension contributions or other entitlements, as applicable based on workers engagement i.e.-fixed term contract, full-time, part-time or temporary. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to CPMU and the World Bank.

Labour conditions: records of workers engaged under the Project, including contracts, registry of induction of workers including CoC, hours worked, remuneration and deductions (including overtime), collective bargaining agreements;

Safety: Reportable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).

Workers: number of workers, indication of origin (local and migrant), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).

Training/induction: dates, number of trainees, and topics.

Details of any security risks: details of risks the contractor may be exposed to while performing its work; the threats may come from third parties external to the project. Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken; grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

2.2.9 Community Workers

All OHS related aspects shall be applicable to this category of workers also, if they are engaged.

2.3 RESOURCE EFFICIENCY AND POLLUTION PREVENTION (ESS3)

2.3.1 Pollution Prevention and Environment Quality Management Plan (PPEQMP)

Dam rehabilitation work in this project can be categorised as civil work including protective works, construction of Building and retaining wall, construction of access road and hydro-mechanical work including maintenance to radial gate, vertical gate and hoist mechanism; requiring labour involvement for works, use of resources such as raw material, water and power during construction, pollution generation from storage and handling of material, generation of waste, generation of hazardous waste, transportation of raw material, etc. As all the proposed structural interventions are within the dams' premises, no adverse impacts are envisaged on communities including on the disadvantaged or vulnerable people.

Resource Efficiency, Pollution Prevention and Management plan is prepared to address potential risks identified with respect to resource use and pollution generation from civil and hydro-mechanical works and also from labour camps and colonies.

2.3.2 Overview of PPEQMP

a) Water Management

Activities interfacing with water bodies like Maintenance to Spillway Radial Gates & Hoist mechanism, Maintenance to vertical gates, Pressure washing downstream portion of the non-overflow portion of Spillway dam etc. will be done with proper measures to prevent the risk of water pollution and impact on fishes.

Use of resources such as water and power will be optimized before start of work.

Construction related impacts and risks for water quality include:

- Accidental release of fuel or chemicals and contamination from poor waste management practices can affect surface and groundwater; although quantum of waste is expected to be small.
- Fuel/oil leakage from construction machinery working near water bodies
- Construction work along river bank
- Generation of sanitary wastes from labour colony and construction sites finding way to water bodies

Pollution prevention and control measures to avoid surface water pollution shall include:

- Labour camp will have adequate sanitation arrangement in terms of fixed toilet with arrangement of sewage collection and disposal. No wastewater from the camp/work force site shall be discharged directly without any treatment in to any surface water channels or drain, which eventually joins surface water bodies.

- The oil/lube storage shall be under roofed areas with impermeable cement concrete surfaces and provided with separate drainage system with oil separators. No discharge from oil/lube storage areas shall be directly discharged in to any open surface water channel/ streams.
- No construction debris and/or spills of construction materials are dumped on to stream waterway.
- Construction work along river bank shall be done in lean season when surface water level has receded and clear construction area is available.

b) Air Quality Management

Construction activities can give rise to dust emissions if not effectively managed and have the potential to affect receptors near to the main construction sites due to dust generated from demolition, excavation, operation of construction equipment and machinery, increased movement of vehicles, onto the local road network. Earth works will result in exposed areas of soil which will potentially generate dust when the weather is windy. The level and distribution of dust emissions varies according to the duration and location of activity, weather conditions, and the effectiveness of suppression measures.

Gaseous emission during construction will be from machinery, equipment and vehicles used for material transportation. The operation of vehicles and equipment will result in emissions of carbon monoxide, sulphur dioxide, and oxides of nitrogen. In particular, all commercial vehicle driven with diesel fuel is often used in India. Impact is expected to be localised. Keeping in view the quantum of work and requirement of raw material, only marginal increases in number of vehicles is expected and therefore emission on village road due to vehicular movement will not be significant, however, OHS norms and do's and don'ts will be adhered to for vehicular movement.

As the project is presently operational and the interventions are not going to alter the project operation in any manner, no operational phase impacts are envisaged on ambient air quality.

Pollution prevention and control measures to avoid air pollution shall include:

Among the air pollutants, dust levels in term of PM_{2.5} and PM₁₀, is the most significant. In order to prevent and control the dust levels, the following measures are to be strictly adhered to:

- The contractor/transporter shall carry valid PUC (Pollution Under Control) certificate and only compliant vehicles shall be deployed during construction.
- The vehicles and equipment used during construction should be well maintained, to ensure minimum emissions. Engineer in Charge will carry out physical inspection to ensure compliance.
- The contractor shall provide wind barrier, if required, depending on most prevailing wind direction and presence of sensitive receptors at downwind side, at perimeter of construction site to arrest or blowing of suspended particle.
- Regular sprinkling of the water will be done on construction sites for dust suppression if there is potential of dust emission from storage of handling of loose material

- If power connection is not available, Mobile DG sets may be used for lighting only during construction phase and they should meet emission and noise standards as per guidelines/standards issued by CPCB.
- All the construction workers and other staff, who get directly exposed to dust, should necessarily be provided with dust masks.

c) Noise and Vibration Control

Sources of noise will be the vehicles and equipment for construction at the project sites. Due to construction activity in the area, noise levels will increase during the period of construction, however, they will remain limited to the work area mainly where construction activity will progress.

Impact of noise generation due to operation of construction machines and equipment is the exposure of workers operating these machines and other who are working in the surrounding. Such impacts can become significant if they are exposed to high noise for long hours continuously.

Pollution prevention and control measures to avoid Noise pollution shall include:

- DG sets, if required, will have a valid Type Approval Certificate and Conformity of Production certificate as per CPCB guidelines.
- All the construction equipment will be required to use available noise suppression devices and properly maintained mufflers.
- Workers in high noise area, will be provided with ear muffs. Workers exposure (time duration) to high noise will also be controlled.
- Minimize the use of noise producing equipment during night hours to avoid the disturbance to locals and wild animals of surrounding area.
- Vehicles to be equipped with mufflers recommended by the vehicle manufacturer.
- Movement of vehicles on village roads especially heavy vehicles for transportation of construction material, equipment, etc. shall be done during day time only.

d) Waste Management from Hydro-mechanical works

This Project intervention include hydro-mechanical works like Maintenance to Spillway Radial Gates & Hoist mechanism, roofing to hoist mechanism of Radial Gates and Maintenance to vertical gate. These activities will generate waste in terms of replaced parts, packaging material, empty containers, use and disposal of oil & grease, iron scrap, etc. There will be a mix of hazardous and non-hazardous wastes. It is important to have a plan ready for disposal of such wastes before start of the activity.

Pollution prevention and control measures with respect to waste management: Project engineer needs to identify all the waste generated from hydro-mechanical work including replaced parts with estimated quantities and categorisation as hazardous and non-hazardous waste. Storage and disposal of removed parts need to be planned by Executive Engineer; separately for hazardous waste which will be given to authorised vendors only.

e) Debris Management

Rehabilitation work will generate construction debris due to activities like

Clearing downstream of spillway channel and construction of retaining wall to protect the left bank in continuation with the existing training wall at Spillway Dam, Construction of Access Road to the right bank of spillway dam, Construction of office cum staff dormitory building etc.

Pollution prevention and control measures in respect of Debris management shall include:

- Debris disposal site shall be identified by contractor and concerned Executive Engineer together and necessarily avoid natural water courses.
- Identifying disposal locations, preferably in low lying areas nearby so as to avoid effort of transporting debris.
- Area on the course of natural drainage should be avoided.
- The construction debris from all operational areas shall be regularly scavenged and disposed off at identified disposal sites only.
 - No dump site shall be located in forest area.
 - No dump site shall be located on agricultural area.
 - The Contractor shall educate his workforce on issues related to disposal of waste.
 - The debris disposal sites have to be suitably rehabilitated by levelling and restoring to original conditions and slopes stabilized.
 - If required, grass and local shrubs should be planted to rehabilitate the site.

Debris and waste can be disposed at the KSEBL land located downstream of the dam satisfying the above conditions.

2.3.3 How water and other resource use will be planned

Resource planning will be done by contractor in consultation with Engineer in charge. After award, the contractor will make an estimate of the raw material requirement, sources for procurement and transportation route. Contractor will discuss the plan with Engineer in Charge at site and get approval.

Material to be procured from quarry/borrow area, shall be identified by contractor along with source. Approval status will be submitted to engineer in charge for consent.

Requirement of water and power at various locations for construction work and labour camp shall be established by contractor and discussed with Engineer in charge. Locations, where DG power is to be used, shall be identified along with location of DG set and its noise and emission impacts on labour and community. Mitigation measures such as ear muffs for labour and sound barrier for community, if required shall be established.

2.3.4 Environmental Quality Monitoring Plan and protocols

Keeping in view that the dam is located in protected areas, environmental quality monitoring will be carried out as discussed below. These requirements are indicative and can be altered and modified as per project components and activities proposed.

Environment Quality monitoring requirements are tabulated below:

| Activity | Parameters | Locations | Frequency | Responsibility |
|---|--|--|--|--|
| Ambient Air Quality | PM _{2.5} , PM ₁₀ and SO ₂ for 24 hours | At two major location of rehabilitation works to be identified by Engineer in Charge | Once before start of construction, once during the construction period and one at end of rehabilitation work | Contractor through NABL accredited Lab |
| Sound Levels | dB(A) levels – day and night equivalents – hourly reading during day and night time for 24 hrs | At two major location of rehabilitation works to be identified by Engineer in Charge | Once before start of construction, once during the construction period and one at end of rehabilitation | Contractor through NABL accredited Lab |
| Wastewater discharge | Physical inspection to ensure wastewater from rehabilitation work is not being disposed off in river | All rehabilitation worksites using water | Once every month | Engineer in charge |
| Debris handling and disposal | Physical inspection to ensure debris from rehabilitation work is being securely disposed off at identified and approved location | All rehabilitation worksites generating debris | Once every month | Engineer in charge |
| Storage and disposal of hazardous waste | Physical inspection to ensure hazardous waste is being segregated and securely disposed off to authorised vendors | All rehabilitation worksites generating hazardous wastes | Once every month | Engineer in charge |

2.3.5 Reporting

Contractor will prepare a Quarterly Progress report (QPR) and submit to Engineer in Charge. The report will cover the compliance status of the Project with the ESMP in their scope and shall include Debris Management, Resource Conservation and Pollution Prevention Plan implementation. The Engineer in Charge through E&S expert at SPMU will include its own monthly inspection report and submit the report to SPMU/IA every quarter.

2.4 COMMUNITY HEALTH AND SAFETY (ESS4)

2.4.1 Overview

Dam rehabilitation work is limited to dam complex, and hence there is no possibility of local community's interference. Intervention of community requires only for Emergency action plans. ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of SPMU/IA to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Occupational health and safety (OHS) requirements for

project workers are set out in ESS2, and measures to avoid or minimize impacts on human health and the environment due to existing or potential pollution are set out in ESS3. ESDD has identified that there will not be any direct risks and impacts on communities due to proposed rehabilitation work including those who are vulnerable. Following sections propose mitigation measures in accordance with mitigation hierarchy to mitigate any indirect impact on communities.

2.4.2 Hazard Identification

Implementations of sub-project activities pose minimum risk to community health and safety risks as the proposed rehabilitation work will be limited to dam area only. However, there is possibility of local community's interference only during the implementation of Emergency Action Plan as identified in the ESDD report. The risks are summarized below:

Traffic and Road Safety – Sub-project activities are largely structural interventions categorised as civil works and hydro-mechanical works. This would require transportation of construction material, equipment and machinery, instrumentation, parts and accessories to the dam. In addition, there will be movement of workers (direct and contract workers) to and from site. Transportation of man and material will increase traffic on the village roads during the period of construction leading to increased risk of accidents, spillages, noise and air emissions on generally deserted village roads. Keeping in view the nature of proposed rehabilitation work, only few vehicles will be added per day, therefore this activity do not pose any risk to community.

Community Exposure to Health Issues – The sub-project activities will require contract workers – skilled and unskilled. It is expected that unskilled workers will be available locally; however, a small number of skilled workforce will come from outside the area and expected to stay at site. Influx of workers and setting up of temporary labour camp interfacing with community may increase the health risk of community. Migrant workers can be potential carriers of new infectious diseases not known in the area and impact the community health. Labour camp in vicinity of community may pose risk of unplanned waste and waste water discharge.

Management and Safety of Hazardous Material – Sub-project civil and hydro-mechanical interventions may require use of hazardous material in limited quantities such as fuels, flammable gases e.g. as acetylene and LPG, etc. Transportation, storage and handling of these hazardous materials requiring careful handling and disposal to minimise risk of public exposure.

2.4.3 Hazard Risk Management

Following measures are proposed to minimise the community health and safety risks due to sub-project activities:

Traffic and Road Safety

- Transportation of loose construction material will be through covered vehicles only
- PUC for all transport vehicles will be made compulsory

- No movement of vehicles at night time
- Drivers will be issued instructions to follow signage and safety norms

Community Exposure to Health Issues

- Health and hygiene requirement of the labour camp will be maintained throughout the project cycle – potable water, power, community/individual kitchen, waste management
- Separate toilets for male and female workers staying in labour camp connected to septic tanks/adequate waste collection and disposal arrangement
- Waste management system will be implemented in labour camp by providing adequate number of bins and collection system to avoid littering of waste
- Labour will be sensitized to follow good health and hygiene practices for their as well as communities health

Incident Management, OHS monitoring, training:

Labour interaction with communities, Incident prevention and management, OHS monitoring, Health and Hygiene, training are discussed as part of labour management Plan ESS2.

2.4.4 Communication and Consultation (Workers & community)

Stakeholder consultation was conducted on 22nd July 2022. It was attended by permanent staff of KSEBL working at dam, local people living in the nearby area, workers of contractor executing certain rehabilitation works at dam site etc. The work proposed to be carried out for the dam was explained to them.

Following is the outcome of the stakeholder consultation meeting:

1. Inhabitation is not there in the close proximity of the dam as the dam is located in forest land.
2. Farming is the main source of livelihood of people in the nearby area. They are planting crops like Coconut, Arecanut, Plantain, Cocoa etc. They also keep livestock and used to sell the milk of cows, buffalo or goats, etc.
3. The people nearby are engaged in the power station and power project colony for unskilled job.
4. 4 numbers of contract workers are working at the dam for the entire period for security and operation & maintenance works of the dam. Special maintenance works of the dam are arranged through local contractors and workers.
5. All the participants welcomed the proposed interventions relating to dam safety.
6. The dam was commissioned in 2004. There are no pending issues regarding dam construction related resettlement.
7. The participants explicitly mentioned that the rehabilitation works of the dam will not way affect them and instead they will be getting some earnings by engaging as unskilled labour for the works.
8. Participants have expressed that they do not have any grievances as far as the rehabilitation works proposed by the KSEBL for the dam.

2.4.5 Emergency Management Plan

Emergency Management Plan should be displayed prominently at work site in local language for ease of understanding of workers and staff. It should contain following information:

1. Name, Designation & Contact Numbers of the site supervisor and alternate to be informed in case of any emergency;
2. Contact details of nearby hospitals, fire department and police department
3. Location of fire extinguishers, first aid boxes, emergency alarm and assembly points
4. Potential Emergencies Situations such as fire, fall, electric shock, etc. & response measures such as use of fire extinguishers, rescue procedures, switching off main power (can be made pictorially).

Responsibility of site supervisor (or his alternate in case he is not present) will be clearly defined including:

1. Assess the level of emergency
2. Providing first aid/organize rescue, as per the emergency situation
3. Assess the need for hospitalization and call ambulance
4. Evacuate the area/limit entry after assessing type of emergency
5. Assess emergency situation and its potential of expanding and inform IA and first responders, as required (fire, police and medical)
6. Prepare accident report – root cause, corrective action and preventive action

2.4.6 Emergency control Centre

Control room at dam serves as Emergency Control Centre, which has basic communication facilities. The same will be upgraded to serve as emergency control centre with following facilities:

- Display of the name of site emergency controller and all relevant phone numbers – project personnel, police, fire, medical, district administration
- Phone connection – landline/mobile (2 numbers)
- Site layout diagram with entry and exit routes / Assembly points
- Two numbers of first-aid boxes with prescribed first-aid medicines
- Two numbers of blankets
- Drinking water
- Two numbers of rescue ropes
- Two numbers of high beam torches
- Fire extinguisher of DCP and CO2 type.

2.4.7 Reference to IFC Environmental Health and Safety Guidelines

The IFC guidelines of environmental health and safety provide detailed guidance note on health and safety requirement and good practices. This manual shall guide contractor and IAs while finalizing site specific contractor's EHS management plan.

2.5 STAKEHOLDER ENGAGEMENT PLAN (ESS10)

2.5.1 Identification of Stakeholders

Based on the current set of proposed interventions, the following potential stakeholders were identified and categorized as Affected Stakeholders, Other Interested Stakeholders, and Disadvantaged & Vulnerable Stakeholder.

- i. **Affected Persons:** There are no affected persons who shall be directly or indirectly adversely affected by the proposed interventions.
- ii. **Other Interested persons:** In relation to structural interventions, these would be contractors, project management consultants, regulatory bodies/institutional stakeholders such as Pollution Control Board, Forest and Wildlife department or other environmental authorities, etc. In relation to non-structural interventions, communities living downstream of dam who are key stakeholders and who would be involved in the implementation of EAP.
- iii. **Disadvantaged and Vulnerable Stakeholders:** Physically challenged, women and elderly would be key stakeholders – requiring special focus and outreach to ensure that they are well informed about the provisions of the EAP.

2.5.2 Stakeholder Consultation

Stakeholder consultation was conducted on 22nd July 2022. It was attended by permanent staff of KSEBL working at dam, local people living in the nearby area, workers of contractor executing certain rehabilitation works at dam site etc. The work proposed to be carried out for the dam was explained to them. Outcome of the meeting is discussed at para 2.4.4 above.

2.5.3 Stakeholder Engagement and Project cycle

Table 1 lists the different types of information, relevant target audience depending on the nature of information, modes and frequency of engagement with these stakeholders.

| Table 1 – Stakeholder Engagement by Activities | | | | |
|---|--|--|--|---------------------|
| Information to be disclosed | Target stakeholders | Tools of engagement & mode of disclosure | Frequency | Responsibility |
| Emergency Action Plans (preparation and implementation) | <ul style="list-style-type: none"> ✓ District Administration, ✓ Revenue department ✓ Police ✓ SDMA, DDMA, NDMA ✓ Print and electronic media ✓ Communities (affected/ other interested) in the dam vicinity | <ul style="list-style-type: none"> ✓ Consultative meetings and EAP Dissemination workshop ✓ Website notifications ✓ SMS alerts ✓ Meetings to inform Village heads or community representatives | <ul style="list-style-type: none"> ✓ Multiple | SPMU |
| Provisions related to Dam Safety | <ul style="list-style-type: none"> ✓ Contractor ✓ SPMU staff ✓ Pollution control Board ✓ Communities (affected/ other interested) in the dam vicinity | <ul style="list-style-type: none"> ✓ Consultation meetings related ESDDs and ESMP ✓ Web disclosure of related ESDDs and ESMP. | <ul style="list-style-type: none"> ✓ Multiple ✓ Must before work starts ✓ During implementation | SPMU |
| Work opportunities for Structural works | <ul style="list-style-type: none"> ✓ Contractors ✓ Consultants | <ul style="list-style-type: none"> ✓ Website notifications ✓ Tender advertisements in newspaper | <ul style="list-style-type: none"> ✓ Multiple ✓ Continuous | SPMU |
| Work opportunities for <ul style="list-style-type: none"> ✓ Petty contracts ✓ Labor | <ul style="list-style-type: none"> ✓ Communities (including disadvantaged persons) ✓ Petty contractor | <ul style="list-style-type: none"> ✓ Website notifications ✓ Meetings to inform Village heads or community representatives | <ul style="list-style-type: none"> ✓ Multiple ✓ Continuous | SPMU and Contractor |
| GBV related provisions | <ul style="list-style-type: none"> ✓ IA officials ✓ Contractor personnel ✓ Consultant personnel | <ul style="list-style-type: none"> ✓ Office circular and training events ✓ Website notifications ✓ Bid documents and Contract provisions | <ul style="list-style-type: none"> ✓ Multiple ✓ Continuous | SPMU |
| Labour management procedure | <ul style="list-style-type: none"> ✓ IA officials ✓ Contractor personnel ✓ Consultant personnel | <ul style="list-style-type: none"> ✓ Website notifications ✓ Bid documents and Contract provisions | <ul style="list-style-type: none"> ✓ Multiple ✓ Continuous | SPMU |
| Grievance mechanisms | <ul style="list-style-type: none"> ✓ Communities (affected/ other interested) ✓ Contractors (for procurement related) | <ul style="list-style-type: none"> ✓ Phone number or Toll free Helpline ✓ Display boards at site with GRM information ✓ Consultative meetings ✓ Website notifications ✓ Meetings to inform Village heads or community representatives | <ul style="list-style-type: none"> ✓ Continuous ✓ Multiple | SPMU |

2.5.4 Timelines for Information disclosure and Feedback

Information to be disclosed with timelines for providing feedback, responding to newspaper advertisements is presented below:

| Disclosure of information/documents | Mode of providing feedback | Timeline for feedback | Conveying of responses by SPMU | |
|--|------------------------------|-----------------------|---|------------------------------|
| | | | No. of days | Mode |
| Draft ESDDs/ESIAs; draft ESMPs | Email id/website | 30 days | Within 7 days of end of feedback period | Website notification |
| Executive Summaries in local languages of ESMP | Email id/website | 30 days | Within 7 days of end of feedback period | Website notification |
| Notice Inviting Tender | E-procurement website of GoK | 2-3 weeks | Within 21 days | e-procurement website of GoK |

2.5.5 Monitoring and reporting

Quarterly progress reports of IA to include the following parameters

| S. No. | Parameters | Status (Nos./description) |
|--------|---|---------------------------|
| 1 | Number of consultation meetings conducted within a reporting period (e.g. monthly, quarterly, or annually); | |
| 2 | Number and types of IEC materials used | |
| 3 | Number of project events published/broadcasted in the local, regional media | |
| 4 | Type and frequency of public engagement activities; | |
| 5 | Number and type of grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline | |

CHAPTER 3: ENVIRONMENTAL AND SOCIAL MITIGATION AND MONITORING PLAN

3.1 PURPOSE OF ES MITIGATION MANAGEMENT AND MONITORING

For the relevant environmental and social risks identified during the ESDD process of the Project, Management Plans are furnished in Chapter 2. This Chapter provides E&S risk/impacts mitigation and management plan, along with monitoring requirement, responsible entity for implementation of mitigation plan as well as monitoring. The mitigation measures are presented ESS wise at Table 3.1.

Table 3.1 Environment and Social Mitigation and Management Plan

| Activity and environmental aspects | Environmental and Social Risks/Impacts | Mitigation Measures | Stage of Action | Monitoring Requirements and Frequency | Responsibility of Implementation of Mitigation Measures | Monitoring Responsibility |
|------------------------------------|---|--|---------------------|--|---|---------------------------|
| Labour Camp (ESS 2) | Labour health, Hygiene, Drinking Water availability and Sanitary waste generation | Provide clean, hygienic and safe camp facilities for workers with provision of safe drinking water, separate canteen facility, first aid, periodic health check-up and waste management. Make Provision for adequate number of toilets separate for male and female, with arrangement of sewage collection and disposal | Before Construction | Physical Inspection by IA before construction and thereafter every 3 months or if any complaint is received whichever is earlier. Review of complaints should be done every month by IA. | Contractor | IA |
| | Water and Power requirement impacting other competitive users | Source of water and power for labour camp as per advisory from IA | Before Construction | | | |
| | Tree cutting by labour for cooking and space heating | Provision of community kitchen/kitchen fuel (LPG) for labour. Restriction of cutting any tree | Before Construction | | | |
| | Outside labour, may be bringing in new and infectious diseases not known to area | Pre deployment health check -up of labour (if workers are planned to stay at site for more than six months) | Before Construction | Review of records of health check-up before start of construction | Contractor | IA |

| Activity and environmental aspects | Environmental and Social Risks/Impacts | Mitigation Measures | Stage of Action | Monitoring Requirements and Frequency | Responsibility of Implementation of Mitigation Measures | Monitoring Responsibility |
|---|--|--|---|---|---|---------------------------|
| | SEAH/GBV risk within the camp. | Training and awareness of workers, identification of GBV hotspots and monitoring, establishing GRM mechanism | Entire duration of project | <ul style="list-style-type: none"> Review of training records and identified GBV hotspots and monitoring arrangement at start and every 3 months Monthly Review of complaints received under GRM | Contractor; IA to establish GRM; GBV support | IA and SPMU for GRM |
| Labour employment and working conditions (ESS 2) | <ol style="list-style-type: none"> Non-payment of wages and overtime Non-compliance to working hours, number of working days per week, rest day and rest time Inadequate facilities at site - drinking water, toilets, food Not providing temporary accommodation for labour free of charge with separate toilet, bathing and lavatory facilities Not providing kitchen and creche, if applicable Employment of child labour | Ensure compliance to BOCW and other applicable legal instruments; latest state government notification issued by Labour Department for minimum wages, working hours, child labour age should be complied with. | Before construction - Contractors Labour License, Insurance, ESI and PF registration Regular review during construction | Document review such as licenses, record register and muster roll; Physical inspection of working condition at site and labour camp; every 3 months or if any complaint is received whichever is earlier; Review of complaints received under GRM every month | Contractor | IA |
| Occupational Health and | 1. Unsafe working conditions – poor | 1. Contractor/Supervisor will inspect the work sites and mark them as high, | Before construction – | Review of training records, review of availability of PPEs, | Contractor | IA |

| Activity and environmental aspects | Environmental and Social Risks/Impacts | Mitigation Measures | Stage of Action | Monitoring Requirements and Frequency | Responsibility of Implementation of Mitigation Measures | Monitoring Responsibility |
|---|--|--|---|--|---|---------------------------|
| Safety during works (ESS 2) | marking, instructions, 2. Not enough PPEs for all workers; PPEs not appropriate for all types of risks at site or Poor quality PPEs 3. Inadequate training and awareness of workers in use of PPEs and/or in emergency response, | moderate and low risk areas and ensure workers follow instruction to work in these areas 2. Adequate number of good quality appropriate PPEs to be provided by contractor – helmets, gum boots, safety belts, safety harness, gloves, overalls, ear plugs, face masks, etc. 3. All workers should be provided with training on use of appropriate PPEs and how to respond during emergency 4. Adequate EHS instructions shall be displayed at site 5. Provision of First aid with availability of trained first aiders shall be ensured 6. SOP shall be developed as per best practices and IFC EHS guidelines for unsafe conditions like working on height, working in confined areas, electrical safety, fall prevention, handling of hazardous material like welding gases 7. Adequate provision of life jacket if working on reservoir side 8. Procedure of incident prevention, investigation and corrective preventive action | training and availability of PPEs During construction – marking of areas as per risks, rehearsing emergency response and identify training needs | Review of accident records and corrective preventive action reports – before start of construction thereafter every 3 months | | |
| Use of resources – water, power and raw material for dam rehabilitation work (ESS 3) | Resource wastage, impact on land environment while procuring material from quarry/borrow areas | Resource planning will be done by contractor in consultation with engineer in charge Estimate of material requirement from quarry/borrow area, identification of nearest locations with approval status. Ensure that material is sourced from quarries or borrow areas which has valid environmental clearance. | Before start of construction work | Review of resource planning ensuring efficiency Review of quarry and borrow material requirement with approval status, validity and environment clearance – once before start of construction | Contractor with IA | IA and SPMU |

| Activity and environmental aspects | Environmental and Social Risks/Impacts | Mitigation Measures | Stage of Action | Monitoring Requirements and Frequency | Responsibility of Implementation of Mitigation Measures | Monitoring Responsibility |
|--|--|---|--------------------------------|--|---|---------------------------|
| Pollution generation from rehabilitation work sites and labour camp (ESS 3) | <ol style="list-style-type: none"> 1. Air and noise emissions from storage and handling of raw material and during execution of civil and hydro-mechanical work 2. Water pollution from construction activities and from labour camp 3. Debris generation from excavation work, if any, and debris generation from repair work 4. Hazardous waste generation from civil construction work such as painting and hydro-mechanical work, replacement of parts, etc. | <ol style="list-style-type: none"> 1. Ensuring covered storage of loose material/sprinkling of water to minimise fugitive emissions 2. Maintaining construction equipment and ensuring DG set used for power have valid certificate of Type Approval and also valid certificates of Conformity of Production as per conformance labelling. DG stack height shall be as per the Consent to be obtained from State Pollution Control Board before start of work. 3. Ensuring use of dust masks, if workers are exposed to dust emissions and ear muffs for exposure to high noise for long durations 4. Provision of mobile toilets at work site 5. Wastewater from construction sites not to be discharged untreated (compliance with general discharge standards) 6. Construction debris to be disposed off at pre-identified and approved site 7. Hazardous waste (Empty barrels/containers/liners contaminated with hazardous chemicals /wastes; Contaminated cotton rags or other cleaning materials) to be separately stored and disposed off to authorized vendors only | During entire project duration | <p>Ambient Air Quality Monitoring (PM_{2.5}, PM₁₀ and SO₂ for 24 hours) at 2 major construction sites, before start of construction (as identified by Engineer in charge) once during construction and once at the end of rehabilitation work</p> <p>Sound Level monitoring (dB(A) levels) at 2 major construction sites (as identified by engineer in charge), once before start of construction once during construction and once at the end of rehabilitation work</p> <p>Monthly physical inspection to ensure wastewater from rehabilitation work is not being disposed off in river; debris is being disposed off at identified locations.</p> <p>soil level : near construction camp site or active work site area where probability of waste discharge exists</p> <p>Physical inspection of use of PPEs, review of DG specification, wastewater discharge, debris handling and disposal – every month</p> <p>Physical inspection of segregation, storage and</p> | Contractor through NABL accredited Lab; Contractor | IA |

| Activity and environmental aspects | Environmental and Social Risks/Impacts | Mitigation Measures | Stage of Action | Monitoring Requirements and Frequency | Responsibility of Implementation of Mitigation Measures | Monitoring Responsibility |
|--|---|--|--|--|---|---------------------------|
| | | | | disposal of hazardous waste to authorised vendor – every month | | |
| Transportation of material to project site through village roads. (ESS 4) | Increase in the traffic on village roads leading to air and noise emissions as well as risk of accidents. | <ol style="list-style-type: none"> All vehicles used by contractors for transportation of persons and material should have valid PUC Lose material should only be transported in covered vehicles | During entire duration of project | Physical inspection and review of documents before construction and thereafter every 3 months or if any complaint is received whichever is earlier | Contractor | IA |
| Stakeholder Engagement Plan (ESS 10) | stakeholder participation, flood, implementing the grievance mechanism, ensuring continuous information transfer through open communication | <p>Grievance mechanism</p> <p>Establishing Early Flood Warning System, awareness programmes to minimise flood impact.</p> <p>EAP consultations, dissemination material, awareness sessions, print and electronic media campaigns</p> | Early in the project, Throughout the project across various activities | | IA | IA |

3.2 ES MITIGATION AND MONITORING PLAN – ACTION RESPONSIBILITY MATRIX

Various preparatory action and plans are to be prepared before start of construction work by contractor and Implementing Agency (Reference Chapter 2 and section 3.1) .Table below lists actions to be taken by contractor and IA.

| By Contractor | | |
|--|---|---|
| Specific Action/ Preparation requirements | Reference Document /format | Stage of Action /Frequency |
| Preparation of Labour Camp Plan (if labor camp are proposed) | Number of workers, number of units required, duration of stay; facilities proposed to be provided – toilets, kitchen drinking water, waste management | Once - Before start of work |
| Health check-up of workers (if workers are planned to stay at site for more than six months) | Health check records | Once - Before start of work |
| Training and awareness of labour – GBV/ SEA, Code of Conduct, OHS requirements | Topics covered, date of training and attendance | First before start of work, thereafter after every 3 months |
| Compliance to labour laws | Copy of Labour license, ESI, PF | First before start of work, thereafter as per expiry/renewal |
| Identification of hazardous working locations and marking and emergency response plan | List of risky activities | Before start of work |
| Availability of PPEs | List of PPEs – number of each type | Before start of work |
| Training of workers on use of PPEs and Emergency Response | Training records | First before start of work, thereafter after every 3 months |
| Ambient air quality and sound level monitoring | As per the report of NABL accredited lab | Before start of work, during construction and at the end of rehabilitation work |
| Identification of authorised vendor of hazardous waste | Name of the vendor, status of authorisation and copy of authorisation | Before start of work |
| Identification of approved quarry/borrow area | Name of the supplier, copy of approval | Before start of work |
| Submission of Quarterly Progress Report | | Within 2 weeks of end of every 3 months period from start date |

| By Implementing Agency supported by EMC | |
|--|---|
| Specific Action/Preparation requirements | Timeline/Frequency |
| Identification of suitable location of labour camp, if applicable | Before start of work |
| Identification of source of water and power for labour camp, if applicable | Before start of work |
| Identification of GBV hotspots | Before start of work |
| Approval of quarry/borrow area | Within one week of submission of details by contractor |
| Identification of ambient air quality and sound level monitoring locations | Before start of work |
| Identification of debris disposal location | Before start of work |
| Establishing GRM and its awareness - poster/signage with contact details | Before start of work |
| Ensuring effectiveness of GRM and review of complaints received | Every month during the entire duration of project implementation |
| Inspection of labour camp ensuring adequate facility | First on set up, thereafter every 3 months |
| Reviewing contractors documents and ensuring compliance to labour laws | First on setup, thereafter every 3 months |
| Ascertaining adequacy of good quality PPEs | Once before start of work, thereafter every 3 months |
| Physical inspection at work site - air emissions, noisy operations, use of PPEs, labour camp, transport routes through buffer zone | Every month during the entire duration of work |
| Submission of Quarterly Progress Report | Within one month, from end of every 3 months period from start date |

CHAPTER 4: IMPLEMENTATION ARRANGEMENTS AND ESMP BUDGET

The ESMP implementation is mainly the responsibility of Contractor engaged for the Works. Implementing Agency is responsible for Sub Project level activities not directly addressed by Contractor such as GBV referral mechanism, Stakeholder engagement etc. The EMC engaged by Implementing Agency will support the IA in implementation monitoring of ESMP.

In compliance with ESMF, the framework provisions of ESMP, which shall be implemented by Contractor will be included as part of Bids and the Contractor upon on boarding shall submit C-ESMP with updated inputs on management plans. The ESMP will be updated, should additional information/ impacts are determined during the project. Rate for the item quoted by the contractor is inclusive of the sum required by the contractor for compliance of E&S standards. A budget provision of 0.3 to 0.5% is made against the major items in the estimate as provision for compliance of E&S standards and ESMP monitoring.

4.1 IMPLEMENTATION AND SUPERVISION ARRANGEMENTS

Table below outlines the management measures and implementation and supervision arrangements for the various activities at different stages of the project.

| S. No | Project Stage/Activity | Management Measures | Responsibility | |
|-------|---|--|------------------------|------------------------|
| | | | Planning and Execution | Supervision/Monitoring |
| 1 | Establishing Labour Camp before start of construction, if required | Provision of separate toilets for male and female, sanitation and waste collection & disposal facilities, provision of kitchen fuel/community kitchen | Contractor | Engineer in Charge |
| 2 | Health check of labour before induction(in case outside labor are proposed to employ and stay for more than six months) | Health from an authorised government hospital/dispensary and submission of record | Contractor | Engineer in Charge |
| 3 | Compliance to labour laws - before start of construction | Ensure compliance to BOCW and other applicable legal instruments including; latest state government notification issued by Labour Department for minimum wages, working hours, child labour age. | Contractor | Engineer in Charge |
| 4 | Identification of GBV hotspots | Physical survey and hotspot identification | E&S Expert at Dam | Engineer in Charge |

| S. No | Project Stage/Activity | Management Measures | Responsibility | |
|-------|---|--|------------------------|------------------------|
| | | | Planning and Execution | Supervision/Monitoring |
| | and accident hotspots on transport route before start of construction | | | |
| 5 | Workers training | Workers training covering SEA/SEAH and GBV risks and consequences, OHS training and emergency actions, Code of Conduct – awareness and acceptance; biodiversity conservation | Contractor | Engineer in Charge |
| 6 | Occupational Health and Safety of workers during entire duration of project | <ol style="list-style-type: none"> 1. Contractor/Supervisor will inspect the work sites and identify the high risk areas, if any; ensures workers follow instruction to work in these areas 2. Adequate number of good quality appropriate PPEs to be provided by contractor – helmets, gum boots, safety belts, safety harness, gloves, overalls, ear plugs, face masks, etc. 3. All workers should be provided with training on use of appropriate PPEs and how to respond during emergency | Contractor | Engineer in Charge |
| 7 | Resource planning before start of construction | <ol style="list-style-type: none"> 1 Resource planning will be done by contractor in consultation with engineer in charge (requirement of water and power at various location for construction work and labour camp) 2 Estimate of material requirement from quarry/borrow area, identification of nearest locations with approval status | Contractor | Engineer in Charge |
| 8 | Pollution prevention during entire project duration | <ol style="list-style-type: none"> 1. Ensuring covered storage of loose material/sprinkling of water to minimise fugitive emissions. 2. Maintaining construction equipment and ensuring DG set used for power have valid certificate of Type Approval and also valid certificates of Conformity of Production as per conformance labelling 3. Ensuring use of dust masks, if workers are exposed to dust emissions and ear muffs for | Contractor | Engineer in Charge |

| S. No | Project Stage/Activity | Management Measures | Responsibility | |
|-------|---|---|---------------------------|------------------------|
| | | | Planning and Execution | Supervision/Monitoring |
| | | exposure to high noise for long durations 4. Provision of mobile toilets at work site 5. Wastewater from construction sites not to be discharged untreated (compliance with general discharge standards) 6. Construction debris to be disposed off at pre-identified and approved site 7. Hazardous waste (Empty barrels/containers/liners contaminated with hazardous chemicals /wastes; Contaminated cotton rags or other cleaning materials) to be separately stored and disposed off to authorized vendors only | | |
| 9 | Safe transportation of man and material during entire duration of project | 1. All vehicles used by contractors for transportation of persons and material should have valid PUC 2. Loose material should only be transported in covered vehicles | Contractor | Engineer in Charge |
| 10 | Inspection of Labour Camp and transport route within buffer zone | 1. Physical inspection ensuring restriction of movement in buffer zone 2. Blocking of access/shortcuts 3. Fixing transport route, speed limit, time of movement through buffer zone | E&S Experts | Engineer in Charge |
| 11 | EHS monitoring | To be undertaken throughout the project implementation period with inspection by E& S staff of contractor | E&S experts of contractor | IA |

Reporting by contractor and monitoring by SPMU

Contractor will prepare a Quarterly Progress report (QPR) and submit to E&S Experts/SPMU giving the compliance of ESMP. Details will include status on:

1. Progress on ESMP implementation work plan.
2. Status of Compliance with E&S statutory requirements such as labour licenses, insurance, etc.
3. ESHS incidents & supervision.
4. Usage (no. required, distributed and used) of Personal Protective Equipment (PPE) such as hard hats, safety shoes and safety vests by workers.

5. Safety at work sites like COVID incidents, providing traffic signage, barriers/delineator, management of traffic, drainage and pliable road surface etc.
6. Training conducted, and worker's participation (submit reports with statistics of training and worker's participation).
7. Functioning of GRM relating to labour aspects, including summary details of Workers grievances, if any.
8. Community grievances, if any.
9. Corrective Actions and planned E&S activities for next quarter.

SPMU will prepare its quarterly monitoring report and submit the same along with contractors report to CPMU.

ANNEXURE 1: OUTLINE OF CONTRACTOR'S ESMP

(will cover all on site issues and responsibility with management)

- 1. Sub-project activities description under Contractor's Scope**
- 2. Licensing Requirement**
 - 2.1 Labour License
 - 2.2 Insurance
 - 2.3 Use of approved quarry/borrow areas, if such material is required
 - 2.4 Any other
- 3. Workforce management under COVID 19 considerations, if applicable**
 - 3.1. Profile of work force – work activities, schedule, contract duration, workforce rotation plan, workers place of stay, workers with underlying health issues
 - 3.2. Measures to mitigate risks on account of COVID 19
 - 3.3. Contingency plan covering – pre-health checkup, access restrictions, hygiene, waste management, accommodation arrangements, PPE provision and usage
 - 3.4. Reporting and handling of Instances of COVID 19 cases, training and communication with workers, training and SOPs on communicating and contact with community
- 4. Labour Camp (if outside labour is accommodated in a labour camp)**
 - 4.1. Location of Labour Camp
 - 4.2. Number of labour to be housed and duration
 - 4.3. Break-up of labour workforce – male, female, children
 - 4.4. Number of Units in Labour Camp
 - 4.5. Source and Provision of Water and Power Connection including Drinking Water
 - 4.6. Cooking Arrangement – Individual Kitchen/community Kitchen
 - 4.7. Source, Type and Provision of Kitchen Fuel
 - 4.8. Toilet facilities – individual/community; fixed/mobile and sewage disposal arrangement
 - 4.9. Waste collection and disposal arrangement
 - 4.10. Identify Risk of Community Interface – any fencing/separation requirement
 - 4.11. Security and general lighting arrangement
- 5. Resource Planning**
 - 5.1. Water and power requirement for works and locations
 - 5.2. Need for water line or electrical wiring
 - 5.3. Raw material requirement and source(s)
 - 5.4. Temporary storage(s) at site and location(s) – cover/uncovered
 - 5.5. Transportation route from source to storage

6. Pollution Prevention

- 6.1. Potential of dust emission from openly stored raw material and mitigation arrangement – covering, sprinkling, etc.
- 6.2. Potential of water pollution from spillage and leakage from raw material storage and preventive measures
- 6.3. Potential of air emissions from works including toxic emissions from paints and chemicals, emissions from DG sets and other construction equipment – locations where potential is high, possibility of community impact, impact on workers, preventive measures such as dust masks for workers, etc.
- 6.4. Potential of noise generation from works (use of equipment and machinery, demolition work) including from any activity planned at night time – locations where potential is high, possibility of community impact, impact on workers, preventive measures such as ear muffs, etc.
- 6.5. Potential of water pollution from works – possibility of leakage to surface water or accumulation in low lying areas; preventive measures/treatment requirement
- 6.6. Estimate of excavated earth/construction debris requiring disposal – quantum, sources(s) of generation, identified dumping sites, transportation mode and route, period of dumping and restoration plan

7. Occupation Health & Safety and Emergency Management

- 7.1. PPE requirement and numbers
- 7.2. Lists of tasks and work zone critical for hazard prevention, if any
- 7.3. Location of warning signage for hazard prevention
- 7.4. Requirement of first aid boxes and portable fire extinguishers
- 7.5. Key person(s) to be contacted during emergency
- 7.6. Protocol for deciding the level of emergency – need for hospitalization, information to authorities, etc.
- 7.7. Process of accident analysis, corrective and preventive measures and need for reporting

8. Addressing GBV Risks

- 8.1. Preventive measures – provision of lighting, separate toilet areas for men and women, increased vigil and security arrangement for community sensitive GBV hotspots, if identified by dam authorities.
- 8.2. Sensitizing and awareness of labour on GBV issues including penalties and legal action against offenders
- 8.3. Awareness about GRM

9. Code of Conduct

- 9.1. Preparation of Code of conduct
- 9.2. Making labour aware of conduct with all the provisions, do's and don'ts, penalties for non-compliances, etc.

9.3 Displaying CoC at prominent locations

9.4 Signing of CoC by workers

10. Awareness and Training

10.1 Plan for training and awareness covering Pollution Prevention, OHS, Use of PPEs, Accident reporting and emergency management, CoC, GBV, GRM, etc.

10.2 Training schedule

10.3 Training records