

Resettlement Plan

Project Number: 55128-001
Livelihood Restoration Plan
November 2021

India: AJ Solar Power Project

Prepared by AEW India West One Private Limited with technical support from EQMS Global Pvt Ltd, Delhi, India, for the Asian Development Bank.

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CURRENCY EQUIVALENTS

(as of November 2021)

Currency unit	–	Indian Rupee (Rs)
INR1.00	=	\$0.01343
\$1.00	=	INR 74.43

ABBREVIATIONS

ADB	–	Asian Development Bank
AEW	–	AEW India West One Private Limited
DH	–	Displaced household
DP	–	Displaced person
EA	–	Executing Agency
GOI	–	Government of India
GRC	–	Grievance Redressal Committee
IA	–	Implementing Agency
LA	–	Land acquisition
L&LRO	–	Land and Land Revenue Office
RFCT inLARR Act 2013	–	The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013
NGO	–	Nongovernment organization
NRRP	–	National Rehabilitation and Resettlement Policy, 2007
PAH	–	Project Affected Household
PD	–	Project Director
R&R	–	Resettlement and rehabilitation
RF	–	Resettlement framework
RO	–	Resettlement Officer
ROW	–	Right-of-way
RP	–	Resettlement plan
SC	–	Scheduled caste
SPS	–	Safeguard Policy Statement
ST	–	Scheduled tribe
TL	–	Transmission Line

NOTE

- (i) In this report, "\$" refers to US dollars.

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1. INTRODUCTION AND PROJECT DESCRIPTION

1.1 Project Background

1. AEW India West One Private Limited (hereinafter referred as “AEW”) is developing a 80 MW solar power plant in Jhakan and Kataria Village, Limbdi Tehsil/Block of Surendranagar district Gujarat, India (hereinafter referred as the “project”).
2. AEW won a project from Gujarat Urja Vikas Nigam Limited (GUVNL) of India for setting up of Grid Connected Solar PV Project in Gujrat of 80 MW capacity for supply of solar energy for 25 years. The proposed project is scheduled for commissioning in 30th July 2022.
3. AEW is aiming to get financing for the project from ADB and committed to comply with ADB Safeguard Policy Statement (ADB SPS, 2009), ADB Social Protection Strategy (2001), ADB Gender and Development Policy (1998) and ADB Access to Information Policy (2018).
4. AEW has taken land of 332 acres on lease for setting up solar plant. 116 landowners will be receiving annual rent for the land for 29 years and 6 months. Land for power evacuation transmission line of about 4-5 Km is yet to be acquired. No encroachers or squatters are identified on the land for the plant.
5. **Table 1.1** and **Table 1.2** provide a snapshot of the proposed project and its implementation schedule. The location of the project is presented in **Figure 1.1**.

Table 0.1: Project Overview

Table Particulars	Description
Project Name	80 MW Solar Power Project
Project Capacity	80 MWac/120 MWp
Project Owner	AEW India West One Private Limited
Location of Site	Village: Jhakan and Kataria Village Tehsil/Block: Limbdi Surendranagar (Gujrat)
Geographical Coordinates	Latitude 22.58 °N Longitude 71.84 °E
Current Status	Grid connectivity obtained for the Project Bay allotment process completed for the Project. Legal due diligence completed on Project land Land procurement on lease started in Jan 2021
Nearest village Settlements	North: Village Mota Timbla South: National Highway 47 East: Village Katariya West: Village Bhalgamda
Site Surroundings	North: Narmada Minor Canal South: National Highway 47 East: Village Katariya West: Village Bhalgamda
Nearest Town Major Town	Surendranagar (35 km in West)
Nearest Railway Station	Nearest railway station District -Surendranagar (30 km in West)
Nearest Airport	Ahmadabad Airport, ~ 120km.
Nearest Sea Port	Mundra Port
Total Land Area	332 acres
Period of land Leasing	29 years 6 Months
Land holding type/ Classification of land	Private agricultural land
Type of Land use (5 km radius from site)	Agricultural land, open scrub, water body and settlement
Present status of the project/project phase	Planning phase.

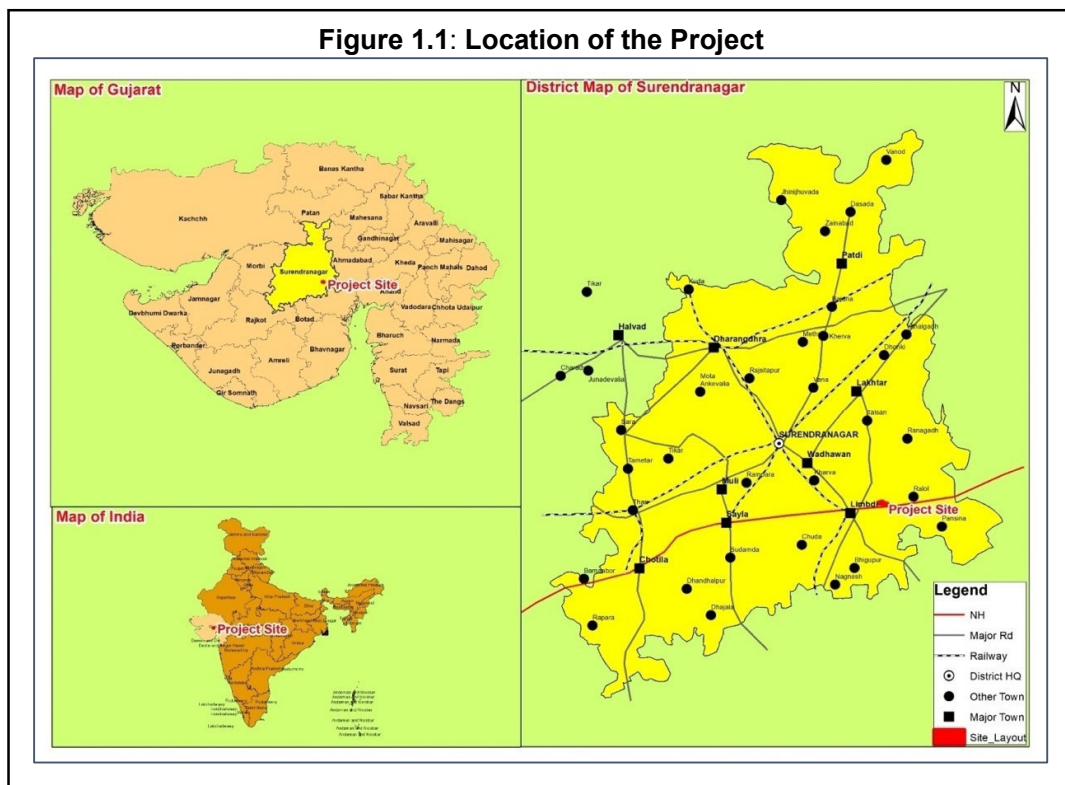
Table Particulars	Description
Power evacuation	Choraniya 220KV Substation. ~ 4-5 km (transmission line)
Location of Plant Substation	Within the solar plant
Mode of Implementation	EPC (Engineering, Procurement and Construction)
Project Life	29 years 6 month

Source: AEW.

Table 0.2: Implementation Schedule

Activity Name	Start	End
Notice To Proceed	Mar-22	Mar-22
Module Ordering	Mar-22	Jun-22
Civil and Mech works	Mar-22	Sept-22
Electrical works	Mar-22	Sept-22
Pre-commissioning	Sept-22	Sept-22
Commissioning and COD	Sept-22	Oct-22

Source: AEW.



1.2 Purpose of the Livelihoods Restoration Plan

6. The 'Livelihoods Restoration Plan' (LRP) was prepared to comply with the principles and objectives of the Asian Development Bank (ADB) Safeguard Policy Statement, Safeguard Requirement 2: Involuntary Resettlement (SR2). This LRP primarily provides framework of measures to address the vulnerability arising out of any economic displacement caused by the project.

7. The LRP focuses primarily on the restoration of means of livelihoods to pre-project levels for the persons temporarily or permanently affected by the project.

8. This LRP defines the implementation approach and steps required to mitigate the livelihoods impacts caused by economic displacement in respect of the identified PAPs on

account of the Project. This LRP is therefore prepared to:

- a. Provide measures that will be applied to mitigate the adverse livelihoods impacts
- b. Provide measures for ongoing engagement with the beneficiaries of the LRP
- c. Detail the approach followed to arrive at the eligibility for availing LRP measures, consultation process for firming up and rolling out the measures
- d. Outline stakeholder consultation process, institutional arrangements such as GRM, disclosure arrangements on an ongoing basis
- e. Provide guidance on LRP implementation including timelines, monitoring indicators

2. LEGAL FRAMEWORK

2.1. Overview

9. The Reference Framework for LRP consists of the following standards and guidelines, in addition to the applicable national and state legislations and standards:

- ADB Safeguard Policy Statement (SPS), 2009;
- ADB Social Protection Strategy, 2001;
- ADB Gender and Development Policy, 1998
- ADB Access to Information Policy, 2019;
- World Bank Group/IFC EHS as well as sector specific Guidelines
- International Covenant on Economic, Cultural and Social Rights and relevant ILO Core Labour Standards Conventions; and
- Other relevant good industry practice guidelines and related documents

10. The national and state Legislations and Standards that were applicable for the project include:

- The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (RFCTLARR), 2013
- The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Gujarat Amendment) Act, 2016 (effective from August 2016)
- The Child Labour (Prohibition and Regulation) Amendment Act, 2016
- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996 and Rules 1998

2.2 ADB'S Safeguard Policy Statement (SPS), 2009

11. ADB has adopted Safeguard Policy Statement (SPS) in 2009 including safeguard requirements for environment, involuntary resettlement and indigenous people. The objectives of the Involuntary Resettlement Safeguard policy is to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre- project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.

12. The involuntary resettlement safeguards cover physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers them whether such losses and involuntary restrictions are full or

partial, permanent or temporary. The three important elements of ADB's SPS (2009) are: (i) compensation at replacement cost for lost assets, livelihood, and income prior to displacement; (ii) assistance for relocation, including provision of relocation sites with appropriate facilities and services; and (iii) assistance for rehabilitation to achieve at least the same level of well-being with the project as without it. The SPS gives special attention to poor and vulnerable households to ensure their improved well-being as a result of project interventions.

3. PROJECT IMPACTS

3.1. Identification of Impacts

13. The total land identified for the proposed plant site of the project is 332 acres of private agricultural land. The project is located in two villages: Katariya village and Jakhan village located in Limdi Taluka of Surendranagar District. Out of 332 acres of total land, approximately 238.7 acres of private land to be procured on lease from the 87 (Eighty) landowners in Katariya village and the remaining 93.3 acres of land to be leased from the 29 (Twenty-One) landowners in Jakhan village, who are primarily engaged in agricultural allied activities for their source of livelihood. The land leasing process for the project started in January 2021 and the process will be completed by June 2022. As reported by the Project Proponent and the local community during the consultation, the lease rent was established based on negotiations held with landowners and the market rate in the area. The lease rent is INR 33,500/Acre/Annum for 29 years & 6 Months with 5 % escalation after every three years on current rates, and lease. Also, it was reported at the site that lease rent INR 33,500/acre/annum will be paid uniformly to all the landowners, irrespective of the aspects like difference in land quality, location of land.

14. Complete list of landowners details of around 116 landowners are collated and available in project files. No Objection Certificate from respective Village Panchayats is also obtained.

Table 3.1: Village wise land details and no of landowners

Sl. no	Village Name	Land Leasing (Acres)	No of Landowners
1	Jakhan	93.3 acres	29
2	Katariya	238.7 acres	87
Total		332 acres	116

Source: AEWIWOPL.

15. According to the government records and from consultations, the entire parcel of land is classified as agricultural land. The total land of the project site is 76% cultivable and 24% non-cultivable. However, due to a scarcity of rain and lack of irrigation facilities, the land is incompatible for intense agricultural activities. The land is also devoid of trees and standing crops except in few land parcels in which cotton, bajra, jowar crops are being cultivated. During the site visit (September 2021) it was observed that the identified land parcels were under cultivation with Kharif season crops. Mostly Kharif Crops like cotton used to be cultivated during monsoon while jowar was cultivated during post-monsoon period in few land parcels.

16. Land leasing will not result in any physical displacement as confirmed during the site visit and discussions held with landowners, representative of the Gram Panchayat of Jakhan, Katariya, Land Aggregator and land team of AEW. No landowners reside in the land parcels proposed for leasing. There will also be no permanent or temporary restriction in access to community facilities due to the project.

17. The details of the land requirement for various components and the present status of the land procurement process are captured in the Table 3.2 below.

Table 3.2 Summary of Land Required for the Project

Project Component	Land Area	Type of Land	Village	Status
Solar Project includes installation of solar modules, internal roads, boundary wall, scrap yard, storage area, Site office, Inverter room, Switchyard, inverters, transformers and main control room	332 acres	Private land	The land is being leased from following villages – Katariya & Jakhan village	According to the site representative, 332 acres private land to be leased. However, the leasing process has just started. The switchyard for the project will be constructed on the same land parcels that would be procured for the proposed solar project. It will be connected to nearby Chorania sub-station.
Internal transmission line	Not Applicable	Not Applicable	Not Applicable	No Internal TL. underground cabling inside the plant. Length of Cable trench approx. 12 KM
External Transmission Lines	To be determined	Private Land	Katariya & Jakhan village	The external transmission is still under planning stage. However, based on the discussion, the length of external transmission line will be approximately 4 to 5 km with 18 to 20 towers. As reported location of towers has not been finalized. Furthermore, it was reported that the transmission line will pass through the private land. The land required for RoW for external transmission line, will be procured on lease. Compensation for the RoW shall be made as per the Ministry of Power 'Guidelines for payment of compensation towards damages in regard to right of way for transmission lines or provision for UG transmission route

Source: AEWIWOPL.

18. Project related land procurement and specific issues: Land procurement related specific issues are as presented in *Table 3.3* below.

Table 3.3 Land procurement and specific issues

Features	Location	No. of Household/ No. of Individuals	Description
Schedule V Area	Katariya/ Jakhan	Not Applicable	The Project Area does not fall under the Schedule V area. There is no tribal population reported by Census of India 2011 in both the villages.
Forest Land	Katariya/ Jakhan	Not Applicable	As per the available information, no forest land has been procured for the project.
Tribal (Schedule Tribe) Land	Katariya/ Jakhan	Not Applicable	According to the information available and the consultation with landowners, the land identified for the project is comprised of private agricultural land, and no tribal land has been procured for the project as there is no tribal population reported.

Features	Location	No. of Household/ No. of Individuals	Description
Landlessness	Katariya/ Jakhan	None	As per the consultation with the landowner, it is understood that the land procurement for the project has not resulted into landlessness of any landowners.
Encroachment and Squatting	Katariya/ Jakhan	None	Based on the discussion with the project team, land aggregator, the local community, and titleholders, the land parcels identified for the project are primarily comprised of private agricultural land. The land belongs to the individual farmers having necessary title deeds. Hence, no encroachments were observed or reported during the site visit.
Physical Displacement	Katariya/ Jakhan	None	Land leasing will not result in any physical displacement as no structure/ hut/boundary wall (temporary or permanent) etc. reported on the proposed land during site visit.
Economic Displacement	Katariya/ Jakhan	6 individuals	During the consultations, around 6 female farm labours reported that there will be shift/displacement from the current farm activities on the proposed land in katariya village.
Land use Change	Katariya/ Jakhan		The project with all its components shall be set up on private land and entire land parcel is reported to be an agricultural land. Under such circumstances, the setting up of the solar power project will result into the permanent land use change to industrial use. The application for the conversion of land shall be applied once the land procurement process is completed.
Affected due to loss of access to facilities/assets	Katariya/ Jakhan	No impact	This has not been established and found relevant.
Temporarily affected during construction	Katariya/ Jakhan	NA	Since the project is planning and pre-construction phase, no impact has been envisaged.

19. Impacts on Agricultural workers/ Non-title holders: There are a few agriculture labour working on the leased landholdings and are typically engaged on a need basis with a daily wage. There are no contract workers (whole time engaged for a contract period) or sharecroppers or tenant farmers etc. associated on the proposed land as verified during discussion with the local community. Two big landowners from Jakhan mainly belonging to Rajput community reported that they hire around 10-12 daily wage agriculture labour during peak cultivation period

20. Women equally participate in agriculture activities and spend 7-8 hours in the field during peak cultivation period and are engaged as daily agriculture wage labour at the rate of Rs.200-250 per day. In both Kataria and Jakhan village consultations were carried out with women, majority of the women population of the village works as agricultural labour within their village land holdings. Their working hours are mostly from 7a.m. to 2p.m. or depend as per the work requirement.

21. During consultation, six women raised their concern and reported that leasing land to the project, may impact their daily engagement in agriculture activities and also affect income they earn during post-harvest of peak cotton and will result in disengagement. Women were

not able to verbalize their opinion to anyone. They raised their concern and asked us to seek options to address the above impact of the project. Also, they expressed their interest in learning new skills through skill development programmes which will somewhere resolve the purpose.

3.2. Stakeholder Consultations

22. In order to engage with the community and enhance public understanding on the Project and address the issues pertaining to plant and TL RoW, various sections of Project Affected Persons and other stakeholders were consulted through focus group discussions (FGD), meetings and individual interviews by AEW and its Consultants. The opinions of the stakeholders and their perceptions were obtained during these consultations. There were altogether 28 consultations and informal group meetings held from November 2020 up to September 2021. The various stakeholders consulted include: landowners, farmers, ASHA, Anganwadi workers; women, vulnerable people; women agricultural workers, head of school; members of the Gram Panchayat including Sarpanch of Village Jakhan and Katariya; revenue officials of the taluk and district; other existing developers nearby. (Ref. Figure 3-1 for a photo-report of the consultations)

23. During consultations/interaction processes with people of the local areas, AEW field staff explained benefit of the project, impacts of transmission line, payment of compensation for damage of crops, trees, huts etc. as per Indian Electricity Act, 2003 and Telegraph Act, 1885, MOP guidelines for payment of compensation for transmission line (Oct 2015), Govt of Gujarat order dated 23.06.16 for payment of compensation for transmission line and measures to avoid public utilities such as schools, hospital etc. People have largely welcomed the construction of the proposed project. Likely affected people (APs) requested for timely payment of lease amounts/ compensation towards crops etc., if damaged during construction activities at the market rate. Their queries were replied to satisfaction and it was assured that compensation would be paid in time after the RP is finalized and the formal process is completed.

Figure 3-1: Stakeholder Consultation at Site



Consultation with Land aggregator and AEW



Consultation with Sarpanch of Jakhan village



Consultation with farmers of Jakhan village



Consultation with farmers of Jakhan village



Consultation with Asha workers of Jakhan village



Consultation with women of vulnerable community



Consultation with Landowners of Kataria village



FGD with women stakeholders



Consultation with Asha workers, Anganwadi workers and women agriculture labour



Consultation with Principal of school

24. As reported, the landowners are satisfied with the leasing of land because the existing agriculture practices on the proposed land has become unviable due to infertile land and shortage of rainfall and increased agriculture labour cost in the region. More than 85 percent of these landowners have an additional land parcel which is more fertile and have better irrigation facility which enables the landowners to continue the farming activities on the remaining land near the village and grow crops like cotton, bajra, jowar and continue to make

their livelihood. Five affected titleholders are reported to be government employees settled in city and ancestral property like land is looked after by immediate and extended family members. During the consultations with the landowners of both Kataria and Jakhan village it was seen that all the landowners have an approximate land holding of area equal to or greater than 5 acres in the proposed site and have given their consent for the land leasing. Three landowners reported that the average earning of a good season from their land parcel leased for project was Rs. 8000-12,000 per acre per annum. As reported by the landowners, the average market rate of the land in the region is around 3.5 lakh/acre to 4.5 lakh/acre. However, along with the cash compensation landowners expressed their interest in learning new skills through skill development programmes.

25. On review of the agreement, it was noted that no land which is disputed, belonging to the scheduled caste/tribe or has construction or houses on it, would be approached for land leasing. The landowners are majorly Hindu and are socially categorized as Other Backward Classes (OBC) (Koli Patel), General (Rajput -Zala), etc. All the landowners interviewed were ration card and voter card holders. Among all the 28 consultations, 70% of the total consultations were done with OBC community as majority of the landowners were from OBC category.

26. 15 women agriculture workers were consulted during site visit, who were reported their daily wages as Rs. 200/-. 6 women agriculture workers reported that there may be reduced agriculture works due to the upcoming solar projects in the region. It is observed that these workers are floating agriculture workers from the nearby villages and are not primarily dependent on the project site land. They expressed their interest in learning new skills through skill development programmes which will enhance their employability and income earning potential.

27. Consultations with the PAHs, including the agriculture workers, if any will continue and will be guided by the Stakeholder Engagement Plan throughout the lifecycle of the project.

3.3. Socio-economic Information of Two Villages

28. Access to education: Majority of the women in Kataria and Jakhan village have received formal education up to primary level. The older generation was lacking the access to education.

29. Access to Health: In Kataria village there is no established primary health centre. Although a mobile vehicle visits the village on weekly basis for medical health services. In casualties, the villagers move to the Limbdi district hospital, where they utilize the health care services. In Jakhan village there is an established primary health centre (PHC). The PHC is run by two Asha workers who organize weekly camps to impart knowledge to the women about malnutrition, childbirth etc. In casualties, the villagers move to the Limbdi district hospital, where they utilize the health care services.

30. Access to skill development programme: In Kataria and Jakhan village both, there are no skill development programmes accessible to women. Although women expressed their interest of learning new skills through skill development programmes.

31. Access to market place: In Kataria and Jakhan village both, women have all the access to the marketplace in Kataria village as well as they occasionally go for shopping of clothes and other essentials in the Limbdi district market on their own.

4. LIVELIHOOD RESTORATION PLAN

4.1 Target Beneficiaries

32. The LRP will help project affected household (PAH) to improve their livelihood and living standards better to pre-project levels or to levels prevailing prior to the beginning of project implementation. It will be a part of sustainable development of PAH for providing skillsets and facilitate access to opportunities to enable project affected persons to benefit directly or indirectly from the project. It will minimise the loss and help them to recover from their losses and subsequently restore their livelihoods. The target beneficiaries of the LRP are: (i) economically affected persons that may be identified in relation to the solar power plant and transmission line including the six women agricultural workers who reported that there may be reduced agriculture works due to the upcoming solar projects in the region, and (ii) landowners who leased their land to the project.

4.2 Interventions

33. During the discussion with the impacted household and community, it is seen that the PAH are engaged in farming because no other options are available for them. If there are any opportunities in future, they wish to enhance their skill and move for better earning occupations. With this feedback, the LRP includes skill development training programme for livelihood restoration and income generation opportunities for the project affected household especially women. Considering the limited employment/ livelihoods opportunities in project area, the solar power plant development is a major economic opportunity. The following measures are outlined as part of LRP:

- Preference for livelihood opportunities in the solar power project for families who lose their primary livelihood due to the project activity and are not receiving compensation/lease amounts, including women agriculture workers. *AEW/WOPL* will train all unskilled willing aspirants, at least one from each PAH, and retrain/upskill skilled project affected person that have some basic skills or are capable of being trained for availing livelihood opportunities. Applicants will be verified and enrolled in a work-orientation training program.
 - engage willing and eligible affected persons (skilled/unskilled) in the project construction and operation phases as per project requirements and engagement policies of AEW, which are best suitable for the execution and operation of the project. Employment opportunities will include unskilled construction work, maintenance work at the facility, 24-hour security, grass-cutting, bush and undergrowth cleaning, module cleaning, panel tilting, and housekeeping activities.
- Provision of training to upgrade the agricultural pattern and improve farm yield. Training type and content will be decided in consultation with subject expert or related institution in the area.
- Conduct vocational training of women labors of community for the advanced techniques of production and packaging of their produces to be able to sell in formal markets
- Advanced trainings: AEW will facilitate to support willing and eligible PAH for the following advanced trainings:
- Financial Management Training Programme (FMTP): Money Management Training sessions will be provided for PAPs. It will be designed to help impacted persons utilise compensation payments appropriately in support of sustainable livelihoods. Strategic cash management training and advisory support services will be provided to all PAPs. Investment experts will be invited to speak to all PAPs about the various investment and interest-bearing instruments available for them to consider.

34. The above set of activities will be further revised and specific details of training activities will be finalized upon completion of identification of affected persons and conduct of participatory assessment and planning.

35. The sustainability of the Livelihood Restoration Plan (LRP) will be ensured through the following measures:

- Active participation of the PAFs
- Active participation of the local community
- Active involvement of all level stakeholders
- De-commissioning Strategy of project by *AEW/WOPL*, and
- Empowering local people by means of MSMEs.

36. Economically affected persons engaged in the leased property for the solar plant prior to September 2021 are eligible for entitlements. Transmission line does not affect utilization or access to the area and as such no cut off date is applicable. The LRP activities will commence 2 months prior to Civil Works and plan implementation will continue for first six months from commencement of civil works to any willing and eligible farmworker/ livelihoods affected person belonging to the two villages in which the plant is located.

5. GRIEVANCE REDRESS MECHANISM

37. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate and facilitate the resolution of affected people's concerns, complaints and grievances related to social performance of the project, more specifically related to compensations (lease amounts), IR entitlements and livelihood support activities – if applicable. Grievance redressal is inbuilt in lease payment or crop/tree compensation process (where applicable) as affected persons are given the opportunity to express their grievances concerning assessment of damages. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social concerns linked to the project. The project-specific GRM is proportional to the risks and impacts of the project and as such, is not intended to bypass the government's own redress process, rather it is intended to address affected people's concerns and complaints promptly, making it readily accessible to all segments of the affected people. The GRM does not impede access to the country's judicial or administrative remedies. The GRC will continue to function, for the benefit of the affected persons, during the entire life of the project including the maintenance period.

38. Steps for grievance redress are as follows:

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

- Grievance boxes located in the village office and at the project site office
- Via telephone hotline
- Via text messages
- Directly to any member of the GRC

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

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

Step 4: Consultation and investigation - The GRC will conduct consultation and investigation activities to determine the merits and extent of the grievance and will be completed within 30 days upon receipt of the grievance. The grievance sender will be interviewed to get additional information about the complaint. The GRC will conduct ocular inspections and interview relevant stakeholders. If needed, coordination with village officials will be done to facilitate resolution of the grievance. Available documents necessary for the investigation will also be reviewed. All information gathered will be properly documented.

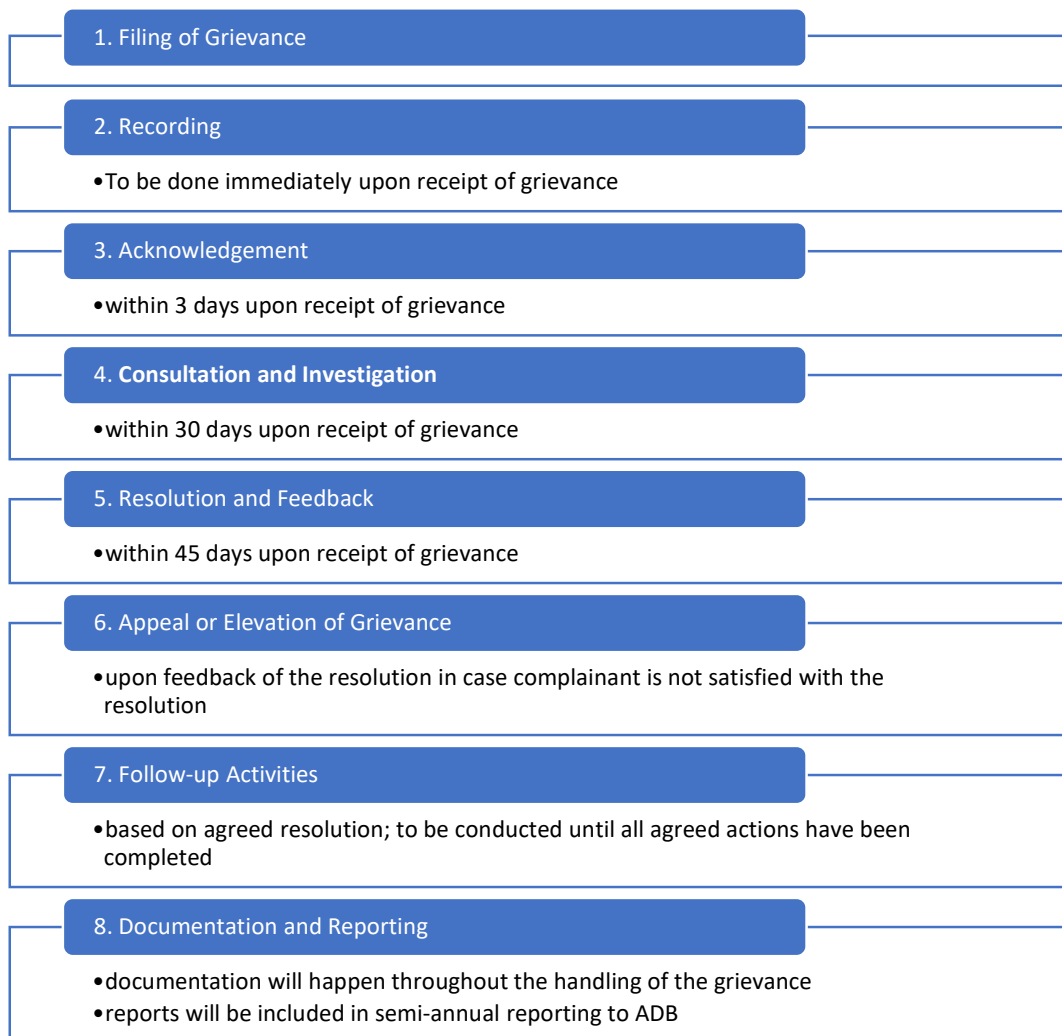
Step 5: Resolution and feedback - All efforts shall be made to provide redress on the complaints within 45 days from receipt of the grievance. The GRC will work closely with the grievance sender to reach an agreement on a mutually acceptable solution. Where mediation is desired, local institutions will be requested to mediate between the project and grievance sender and other concerned stakeholders. Agreed resolution will be provided in writing to the grievance sender within the prescribed duration. For anonymous grievances, responses will be posted at the project site bulletin board and at the village office.

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

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

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

Process Flow



39. Implementation arrangements at the site level – The GRC will be composed of the Construction Manager, Site Admin Manager, and the E&S Expert at the site. The Construction Manager will head the GRC. Meanwhile, the E&S Expert will be in-charge of the grievance register, conduct monitoring activities, and prepare grievance reports.

40. Information dissemination - During project preparation, information regarding the formation and functioning of project level GRC will be disclosed as part of the public consultation process. Villagers will be provided with handouts with key information on the GRM, including hotline numbers that they can access. GRM posters with contact numbers will be put in prominent places such as village halls, construction site and other places where stakeholders gather.

6. CONSULTATION AND INFORMATION DISCLOSURE

41. The draft/summary of LRP will be disclosed by the AEW to the affected households and other stakeholders by placing it on website of AEW. In addition, hardcopies of the report in English and Gujarati, will be made available at site and village offices. The collection of comments will take place after two weeks of the disclosure of the LRP, followed by the

compilation of the comments and responses received. Subsequently, the AEW will organize further public consultation meetings with the stakeholders to share the views of public on the Plan for all possible clarifications. The feedback from the consultation will be reviewed and incorporated in the revised and final LRP. The consultation process will continue throughout the project implementation period. AEW will disclose revisions of the LRP and updates if any, on its website by providing relevant information of monitoring reports for the benefit of affected people and other stakeholders. This is to be done in a timely manner and in English (full report) and Gujarati (summary).

42. AEWIWOPL will also disclose the grievance redress mechanism to solicit feedback from affected persons and other stakeholders. Providing regular feedback to relevant stakeholders is useful in clarifying expectations about what the mechanism does and does not do; to encourage people to use the mechanism; to present results (no personal details/confidential information of affected persons/GRM users); and to gather feedback to improve the grievance system.

43. The process of consultation will be continued during project implementation and even during O&M stage. Consultations will be guided by the Stakeholder Engagement Plan.

7. BUDGET

44. AEW shall provide sufficient budget for implementation of this LRP. No cash compensations or transfers are envisaged. The proposed measures are 'soft' in nature and will be taken up within the ESMP budgets and CSR budgets of AEW.

8. INSTITUTIONAL ARRANGEMENTS,

45. The institutional framework and the roles and responsibilities of various institutions to be involved in the R&R activities of the project and implementation of LRP are described below.

46. AEW together with its Consultants is responsible for the overall execution of the project. The Project Manager of AEW at plant site will be responsible for ensuring implementation of LRP including coordination with relevant stakeholders, making available required budgets, appointment and facilitating services of specialists for undertaking LRP activities. Details of the staff with corresponding roles and responsibilities are as follows: The organization structure is also presented as Annexure -1.

At AEW Head Office –

- Project In-Charge (Head – Renewable Energy) responsible for allocation of resources, SPOC for ADB, Head of Grievance Panel for the project, compensation payments
- Project HR (Manager Accounts): ensure availability of requisite personal, arrange E&S training and awareness program, participate in GRM
- Project Technical Design In-charge (Director - Technical): ensure adoption of EMP measures related to design in project design and procurement, inclusion of Environmental and social measures as per ESIA, LRP, RP in the contract and ensure its implementation, participate in GRM, reporting to ADB
- Technical E&S advisory and management team from - EQMS Global Pvt Ltd: ensure compliance of EMP and Social management plan at site, help in periodic E&S reporting to ABD, Participate in GRM

At Site -

- Project & Contract Manager (Construction Manager): Ensure compliance to Environment and social management requirement by every vendor at site as

per ESIA, RF, LRP, and other committed documents, resolve Grievances and forward unresolved grievances at Site level to Head office and manage the engagement of the E&S expert. Ensure effective implementation for EHS requirements by contractors, participate in GRM.

- Administration Manager - Site (Site Admin Manager): Reporting to the Construction Manager, ensure compliance to ESIA, RF, LRP requirements - including coordinating with affected persons for conduct of trainings, awareness sessions, assist in post training support in LRP measures, in coordination with the E&S Expert.
- E&S Expert (Third Party Outsource Agency – EQMS Global Pvt Ltd): Reporting to the Construction Manager, conduct regular surveillance and ensure implementation of E&S requirements (including health and safety) at site as per ESIA, LRP, RF. Undertake assessment as per RF, LRP for transmission line, prepare periodic compliance report, participate in missions, receive, analyze grievance and help resolve. They will also ensure the following.
 - conduct community consultations and other engagement activities
 - decide on eligible affected persons
 - conduct trainings or engage third party groups to conduct trainings
 - identify and hire affected persons
 - conduct monitoring activities
 - prepare reports

47. The AEW and Its Consultants will maintain all databases and work closely with Affected persons /PAPs and other stakeholders.

48. With a view to further improve the LRP implementation capacities of AEW, team will undergo an orientation and training in livelihoods management at the beginning of the project. The capacity development training inputs would include ADB resettlement policy and principles. The training activities will focus on issues concerning - principles and procedures of livelihoods restoration; public consultation and participation; entitlements and compensation disbursement mechanisms; grievance redressal; and monitoring of resettlement operation. The training would specifically focus on the differences between provisions of ADB policy and the relevant country laws. The awareness of these differences and the need to follow the provisions of the ADB policy are critical for successful implementation of the LRP.

9. IMPLEMENTATION SCHEDULE

49. The project implementation will consist of the three major phases, namely project preparation, land acquisition and rehabilitation/LR of Affected persons. In line with the principles laid down in this LRP, AEW will ensure that project activities are synchronized between the LRP implementation activities as well as the project implementation. The AEW will ensure that a comprehensive income and livelihood rehabilitation program, supported by adequate budget, is in place to help displaced persons, improve, or at least restore, their incomes and livelihoods. The LRP activities will commence 2 months prior to Civil Works and plan implementation will continue for first six months since commencement of civil works and is presented in table 9-1.

Table 9 - 1. Implementation Schedule

Activity	Target Month	Coinciding Project Activity	Remarks
Identification of affected persons eligible and willing for LRP activities	Jan 22 – Feb 22	Prior to Commencement of civil works	Ongoing up to Feb 22

Activity	Target Month	Coinciding Project Activity	Remarks
Assessment of training needs	Feb 22	Prior to Commencement of Civil works	Training needs assessed for vast majority of identified and willing affected persons. This is an ongoing process till LRP implementation
Conduct of trainings, support activities	Feb 22 – May 22	Prior to Electrical works	Schedule will be finalized based on number participants and type of trainings/ activities and informed in sufficient advance to facilitate maximum participation
Post training support – facilitating in accessing livelihoods	May 22 – Jun 22	Prior to Pre-commissioning	
Monitoring of LRP activities	Sept 22	Commissioning	
Setting up and operationalization of GRM	Jan 22	Land procurement	GRM to be operational through the project period.

10. MONITORING AND REPORTING

50. Monitoring will be the responsibility of AEW and EQMS Global Pvt Limited (qualified EHS&S Consultants, engaged AEW). AEW will disclose semi-annual monitoring reports on their safeguards implementation performance on AEW's website and submit the reports to ADB for information and disclosure. An assessment will be conducted upon completion of LRP activities to determine if economically affected persons have their livelihoods restored to pre-existing conditions. The report will be submitted by Oct 30, 2022.

51. Since project is unlikely to have significant adverse impacts, no external monitoring is proposed.

ANNEXURE – 1: Organization Structure

