Draft Initial Environmental Examination

August 2014

IND: Rajasthan Urban Sector Development ProgramSewerage Subproject in Bhilwara

Prepared by Rajasthan Urban Infrastructure Development Project, Government of Rajasthan for the Asian Development Bank

CURRENCY EQUIVALENTS

(as of 28 August 2014)

Currency unit – Indian rupees (Re/Rs)

Re1.00 = \$0.016 \$1.00 = Rs60.3395

Abbreviations

ADB – Asian Development Bank

AE – Assistant Engineer

ADB – Asian Development Bank
ASI – Archeological Survey of India
ASO – Assistant Safeguards Officer
BNP – Bhilwara Nagar Parishad
CFE – Consent for Establishment
CFO – Consent for Operation

CPCB Central Pollution Control Board

EA – Executing Agency

EAC – Expert Appraisal Committee EC – Environmental Clearance

EHS – Environmental Health & Safety
EIA – Environmental Impact Assessment

SEIAA – State Environmental Impact Assessment Authority

EMP – Environmental Management Plan;

GOI – Government of India
GOR – Government of Rajasthan
IA – Implementing Agency

IEE – Initial Environmental Examination;

PIU – Project Implementation Unit; PMU – Project Management Unit

LSGD – Local Self Government Department MOEF – Ministry of Environment and Forest

MLD – Million Liters per Day LPCD – Liters per Capita per Day

PE – Polyethylene

DWC – Double Corrugated Duct

NHAI – National Highways Authority of India

NOC – No Objection Certificate

PHED – Public Health Engineering Department

PO – Project Officer

PMDSC – Project Management, Design and Supervision Consultant

PPTA – Project Preparatory Technical Assistance

PWD – Public Works Department

REA – Rapid Environmental Assessment Checklist

RoW – Right of Way

RPCB – Rajasthan Pollution Control Board

RUIDP – Rajasthan Urban Infrastructure Development Project

RUSDP – Rajasthan Urban Sector Development Program

SPS – Safeguard Policy Statement, 2009

STP – Sewage Treatment Plant

ULB – Urban Local Body

WEIGHTS AND MEASURES

°C Degree Celsius

km kilometre

lpcd litres per capita per day

mm milli meter m metre

MLD million litres per day

mm millimetre Nos Numbers

Sq.km Square Kilometer

NOTES

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

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EXECUTIVE SUMMARY

- 1. The proposed Rajasthan Urban Sector Development Program (RUSDP) will complement the past and ongoing efforts of Government of Rajasthan (GoR) to improve water supply and wastewater services to the residents of the state of Rajasthan. The program component of the RUSDP will support policy reforms and consolidate institutional development and governance improvement in the urban sector in the state, while the investment component of the RUSDP will invest in water distribution network improvements and sewerage systems in the six project cities¹ each having a population of more than 100,000, and identified considering the lack of basic services at present and willingness to undertake reforms and institutional restructuring. RUSDP will be implemented over a 5-year period beginning in March 2015, and will be funded by ADB via a Sector Development Program (SDP) loan modality
- 2. Bhilwara Town sewerage subproject is one of the subprojects proposed under the investment component of RUSDP. At present there is no sewerage system in the town, due to which most of the households depend on septic tanks for disposal of sewage. Effluent from septic tanks and sullage, and sewage from houses without septic tanks is let off into open drains which ultimately collect in low lying areas in the outskirts of the town. Accumulated wastewater is partially pumped to a sewage treatment plant of 10 MPD developed and operated by a private industry that reuses the treated wastewater. Currently, a sewerage project is under implementation by Bhilwara Nagar Parishad with technical support of the RUIDP. This project however do not cover entire town, so it is proposed to provide sewer system in uncovered areas under this RUSDP. Currently, a water supply project is also under implementation in Bhilwara by Public Health Engineering Department, and therefore no water supply investments are proposed under RUSDP.
- 3. ADB requires consideration of environmental issues in all aspects of the Bank's operations, and the requirements for Environmental Assessment are described in ADB's SPS (2009). This Initial Environmental Examination (IEE) addresses the infrastructure components proposed under Bhilwara sewerage subproject.
- 4. **Categorization.** Bhilwara sewerage subproject is classified as Environmental Category B as per the SPS as no significant impacts are envisaged. Accordingly, this Initial Environmental Examination (IEE) assesses the environmental impacts and provides mitigation and monitoring measures to ensure that there are no significant impacts as a result of the project.
- 5. **Project Scope**. The subproject is formulated to address gaps in sewerage infrastructure in a holistic and integrated manner. The main objective of the RUDSP is to improve water efficiency, security, and provide safe sewage collection, and with the on-going investments in sewage treatment, this will have an important effect on public health and environment. Investments under this subproject include: (i) laying new sewers (558 km); and (v) provision of sewer connections to houses.
- 6. **Implementation Arrangements.** The Local Self Government Department (LSGD) of Government of Rajasthan will be the Executing Agency (EA) and existing RUIDP will be the Implementing Agency (IA). The LSGD will be responsible for overall strategic planning, guidance and management of the RUSDP, and for ensuring compliance with tranche release conditions and loan covenants. A policy support unit will be established in the LSGD to support

¹ Pali, Tonk, Ganganagar, Jhunjhunu, Bhilwara and Hanumangarh

the government for implementation of the tranche release policy actions under the program loan. The RUIDP will be responsible for planning, implementation, monitoring and supervision, and coordination of all activities under the RUSDP. The RUIDP will recruit two consulting firms – (i) project management, design and supervision consultant (PMDSC), and (ii) community awareness and participation consultant (CAPC) to provide support in implementation of RUSDP. Six Project Implementation Units (PIUs), one each of in six project towns, shall be set up directly to assist in implementation. PMU will support PIUs in implementation, management and monitoring of the project. PMU and PIUs will be assisted by PMDSC and CAPC. PIUs will appoint construction contractors to build infrastructure. Once the infrastructure is built and commissioned, the Urban Local Bodies will operate and maintain the infrastructure. Project Officer (Environment) at PMU and Assistant Safeguard Officer (ASO) at each of the PIUs will be responsible for environment management and monitoring activities, and will be supported by Environment Safeguard Specialist of PMDSC Team. Contractor personnel will include an Environment, Health and Safety (EHS) supervisor.

- 7. **Description of the Environment.** Subproject components are located in Bhilwara Town and in its immediate surroundings which were converted into urban use for many years ago, and there is no natural habitat left at these sites. The project sites are located in existing road right of way (RoW) and government-owned lands. There are no protected areas, wetlands, mangroves, or estuaries in or near the project locations. Soils are deep, and do not require cutting of rocks for pipe laying.
- 8. **Environmental Management.** An environmental management plan (EMP) is included as part of this IEE, which includes (i) mitigation measures for environmental impacts during implementation; (ii) an environmental monitoring program, and the responsible entities for mitigating, monitoring, and reporting; (iii) public consultation and information disclosure; and (iv) a grievance redress mechanism. A number of impacts and their significance have already been reduced by amending the designs. The construction phase EMP will be included in civil work bidding and contract documents.
- 9. Locations and siting of the proposed infrastructures were considered to further reduce impacts. These include (i) locating facilities on government-owned land to avoid the need for land acquisition and relocation of people; and (ii) laying of pipes in RoW alongside main/access roads, to reduce acquisition of land and impacts on livelihoods specifically in densely populated areas of the town.
- 10. Potential impacts were identified in relation to location, design, construction and operation of the improved infrastructure. During the construction phase, impacts mainly arise from the need to dispose of moderate quantities of waste soil and disturbance of residents, businesses, and traffic. These are common temporary impacts of construction in urban areas, and there are well developed methods for their mitigation. Mitigation measures have been developed to reduce all negative impacts to acceptable levels. Resettlement Plan prepared for the Bhilwara Subproject addresses temporary resettlement/livelihood issues resulting mainly from laying of sewers in busy commercial areas.
- 11. Measures such as appropriate scheduling of works (non-monsoon season, low traffic hours, etc.,) and minimizing inconvenience by best construction methods will be employed. Traffic management plan will be prepared for sewer-laying works on busy roads. In the operational phase, infrastructure will operate with routine maintenance, which should not affect the environment. Facilities will need to be repaired from time to time, but environmental impacts will be much less than those of the construction period as the work will be infrequent, affecting

small areas only. Measures are included to prevent industrial discharges into sewers, which may affect the working of sewage treatment plants.

- 12. Mitigation measures have been developed to reduce all negative impacts to acceptable levels. Mitigation will be assured by a program of environmental monitoring to be conducted during construction. The environmental monitoring program will ensure that all measures are implemented, and will determine whether the environment is protected as intended. It will include observations on- and off-site, document checks, and interviews with workers and beneficiaries. Any requirements for corrective action will be reported to the ADB.
- 13. The stakeholders were involved in developing the IEE through discussions on-site and public consultation, after which views expressed were incorporated into the IEE and in the planning and development of the project. The IEE will be made available at public locations in the city and will be disclosed to a wider audience via the ADB and RUIDP websites. The consultation process will be continued and expanded during project implementation to ensure that stakeholders are fully engaged in the project and have the opportunity to participate in its development and implementation.
- 14. The citizens of the Bhilwara Town will be the major beneficiaries of this subproject. The sewerage system will remove the human waste from their homes safely and quickly. Combined with the on-going investments in sewage treatment, this subproject, in addition to improved environmental conditions, will improve the over-all health condition of the town. People would spend less on healthcare and lose fewer working days due to illness, so their economic status should also improve, as well as their overall health.
- 15. **Consultation, Disclosure and Grievance Redress.** Public consultations were done in the preparation of the project and IEE. Consultations will continue throughout the design and project implementation period with the assistance of the CAPC. A grievance redress mechanism is described within the IEE to ensure any public grievances are addressed quickly.
- 16. **Monitoring and Reporting.** The PMU and PMDS consultants will be responsible for monitoring. The PMDSC will submit monthly/semi-annual monitoring reports to PMU, and the PMU will review and send the semi-annual monitoring reports to ADB. ADB will post the environmental monitoring reports on its website.
- 17. **Conclusions and Recommendations.** The proposed project is therefore unlikely to cause significant adverse impacts. The potential impacts that are associated with design, construction and operation can be mitigated to standard levels without difficulty through proper engineering design and the incorporation or application of recommended mitigation measures and procedures. Based on the findings of the IEE, there are no significant impacts and the classification of the project as Category "B" is confirmed. No further special study or detailed environmental impact assessment (EIA) needs to be undertaken to comply with ADB SPS (2009) or Gol EIA Notification (2006).

I. INTRODUCTION

A. Background

- 1. **Project background and context**. The proposed Rajasthan Urban Sector Development Program (RUSDP) will complement the past and ongoing efforts of Government of Rajasthan (GoR) to improve water supply and wastewater services to the residents of the state of Rajasthan. The program component of the RUSDP will support policy reforms and consolidate institutional development and governance improvement in the urban sector in the state, while the investment component of the RUSDP will invest in water distribution network improvements and sewerage systems in the six project cities² each having a population of more than 100,000, and identified considering the lack of basic services at present and willingness to undertake reforms and institutional restructuring. RUSDP will be implemented over a 5-year period beginning in March 2015, and will be funded by ADB via a Sector Development Program (SDP) loan modality. The expected impact of the RUSDP will be sustainable urban development in Rajasthan. The expected outcome will be improved urban service delivery in Rajasthan. RUSDP will have five outputs, out of which Outputs 1 and 2 will be supported by the program component, while Outputs 3, 4 and 5 will be supported by the investment component.
- 2. The focus of the RUSDP investment will be on water supply and sewerage infrastructure. A series of subprojects will be implemented under the Project, with each subproject providing improvements to water supply or sewerage or both in a project town.

B. Background of IEE

3. Bhilwara Town sewerage subproject is one of the subprojects proposed in RUSDP. At present, there is no sewerage system in the city, except a sewage treatment facility developed and operated by a private industry, which reuses the treated water. Under the RSUDP, it is proposed to provide sewage collection system in Bhilwara. ADB requires the consideration of environmental issues in all aspects of the Bank's operations, and the requirements for environmental assessment are described in ADB's Safeguards Policy Statement (2009). Accordingly, this Initial Environmental Examination (IEE) has been conducted to assess the environmental impacts and provide mitigation and monitoring measures to ensure that there are no significant impacts as a result of the subproject.

C. Environmental Regulatory Compliance

4. Table 1 presents a summary of environmental regulations and mandatory requirements applicable to Bhilwara Town sewerage subproject.

Table 1: Applicable Environmental Regulations

Description	Requirement
India. Environmental Clearance is required for certain defined activities/projects, and this must be obtained before any construction	Project is not a listed activity in Schedule I of this notification and hence environmental clearance is not required.
	The EIA Notification of 2006 set out the requirement for environmental assessment in India. Environmental Clearance is required for certain defined activities/projects, and this

² Pali, Tonk, Ganganagar, Jhunjhunu, Bhilwara and Hanumangarh

Law	Description	Requirement
	acquisition) may commence. Projects are categorized as A or B depending on the scale of the project and the nature of its impacts. Category A projects require Environmental Clearance from the Ministry of Environment and Forest (MoEF). Category B projects require Environmental Clearance from the State Environmental Impact Assessment Authority (SEIAA).	
Water (Prevention and Control of Pollution) Act of 1974, Rules of 1975, and amendments	Act was enacted to provide for the prevention and control of water pollution and the maintaining or restoring of wholesomeness of water, by Central and State Pollution Control Boards and for conferring on and assigning to CPCB/SPCBs powers and functions relating to water pollution control. Control of water pollution is achieved through administering conditions imposed in consent issued under provision of the Water (Prevention and Control of Pollution) Act of 1974. These conditions regulate the quantity and quantity of effluent, the location of discharge and the frequency of monitoring of effluents. Any component of the subproject having the potential to generate sewage or trade effluent will come under its purview. Such projects have to obtain Consent For Establish (CFE) under Section 25 of the Act from Rajasthan Pollution Control Board (RPCB) before starting implementation and Consent For Operate (CFO) before commissioning.	Not applicable Wastewater Collected from the houses should be disposed into natural environment (on land or into stream etc) only after appropriate treatment meeting the disposal standards. See below.
Air (Prevention and Control of Pollution) Act of 1981, Rules of 1982 and amendments.	This Act was enacted to achieve prevention, control and abatement of air pollution activities by assigning regulatory powers to Central and State boards for all such functions. The Act also establishes ambient air quality standards The projects having potential to emit air pollutants into the atmosphere have to obtain CFE and CFO under Section 21 of the Act from RPCB The occupier of the project/facility has the responsibility to adopt necessary air pollution control measures for abating air pollution.	Not applicable
Environment (Protection) Act, 1986 and CPCB Environmental Standards. Noise Pollution	Emissions and discharges from the facilities to be created or refurbished or augmented shall comply with the notified standards Rule 3 of the Act specifies ambient air quality	Appendix 2 provides applicable standards for discharge of pollutants, ambient air quality. etc., Appendix 3 provides
(Regulation and	standards in respect of noise for different	applicable noise standards.

Law	Description	Requirement
Control) Rules, 2000	areas/zones.	-
amended up to 2010.		
Ancient Monuments and Archaeological Sites and Remains Act, 1958 and Ancient Monuments and Archaeological Sites and Remains (Amendment and Validation) Act, 2010 Rajasthan State	The Act designates areas within 100 meters (m) of the "protected monument/area" as "prohibited area" and beyond that up to 200 m as "regulated area" respectively. No "construction" is permitted in the "prohibited area" and any construction activity in the "regulated area" requires prior permission of the Archaeological Survey of India (ASI).	There are no protected monuments in Bhilwara City. - Project implementation
Environment Policy, 2010 including And Rajasthan Environment Mission and Climate Change Agenda for Rajasthan (2010-14)	2006 and core objectives and policies are: - Conserve and enhance environmental resources; assure environmental sustainability of key economic sectors; and, improve environmental governance and capacity building - it recommends specific strategies and actions to address the key environmental issues: water resources, desertification and land degradation, forest and biodiversity, air quality, climate change: adoption and mitigation, mining, industry, tourism, energy, urban development, etc Establishment of Environment Mission under the chairpersonship of the Chief Minister and a Steering Committee under the chairpersonship of Chief Secretary, Government of Rajasthan Tasks force set up for six key areas	should adhere to the policy aims of: conservation & enhancement of environmental resources, integration of environmental concerns into projects/plans, and capacity building in environmental management - under water sector, major concerns, as the policy notes, are: huge water losses & wastage, declining water availability, pollution - Relevant recommendations for the project include: control of losses, integrated water resources management, control of raw water pollution, reuse and recycling -avoid/minimize use of forest lands With reference to Climate change adoption & mitigation following should be considered in the project: - diminishing flows in surface water bodies, and groundwater depletion, and revival traditional water bodies as water sources (lakes/tanks) - equal stress on demand side management in water -minimize energy use - design energy efficiency systems-
The Rajasthan Monuments, Archaeological Sites and Antiquities Act, 1961; the Rajasthan Monuments, Archaeological Sites and Antiquities (amendment) Act	Any construction/excavation work in the 'protected area' (as declared by GoR under the Act) requires priori permission of Department of Archeology & Museums -Application under the Rules shall be submitted to Director, State Archeological Department, at least 3 months prior to the work. Department provides conditional permission, including time for completion,	There are no monuments in the town. However, in case of chance finds, the contractor/PIU will be required to follow a protocol as defined in the Environmental Management Plan (EMP).

Law	Description	Requirement
2007	procedures to be followed during the work	
	and for chance finds etc.	
The Right to fair compensation and transparency in land acquisition, rehabilitation and resettlement Act,	Private land acquisition is guided by the provisions and procedures of this Act.	Not applicable to this subproject as there is no private land acquisition or resettlement
2013		<u> </u>
Labor Laws	The contractor shall not make employment decisions based upon personal characteristics unrelated to job requirements. The contractor shall base the employment relationship upon equal opportunity and fair treatment, and shall not discriminate with respect to aspects of the employment relationship, including recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment or retirement, and discipline. The contractor shall provide equal wages and benefits to men and women for work of equal value or type.	Appendix 7 provides applicable labor laws including amendments issued from time to time applicable to establishments engaged in construction of civil works.
Biodiversity Act of 2002	The Biodiversity Act 2002 primarily addresses access to genetic resources and associated knowledge by foreign individuals, institutions or companies, to ensure equitable sharing of benefits arising out of the use of these resources and knowledge to the country and the people.	Not applicable
Ramsar Convention, 1971	The Ramsar Convention is an intergovernmental treaty that provides the framework for national action and international co-operation for the conservation and wise use of wetlands and their resources. India is one of the signatories to the treaty. The Ramsar convention made it mandatory for the signatory countries to include wetland conservation in their national land use plans.	There are no Ramsar sites in Bhilwara. Not applicable to Bhilwara sewerage subproject
Wildlife Protection Act, 1972	This overarching Act provides protection to wild animals, birds, plants and matters connected with habitat protection, processes to declare protected areas, regulation of wildlife trade, constitution of state and national board for wildlife, zoo authority, tiger conservation authority, penalty clauses and other important regulations.	Not applicable
Forest (Conservation) Act, 1980	The Forest (Conservation) Act prohibits the use of forest land for non-forest purposes without the approval of Ministry of Environment and Forests (MoEF), Government of India	Not applicable; none of the components of the subproject are located in forest
Rajasthan Forest	This Act makes the basis for declaration of	Not applicable

Law	Description	Requirement
Act, 1953 and	Reserved Forests, constitution of village	
Rajasthan Forest	forest committees, management of reserved	
Rules, 1962	forests and penalties and procedures.	

- 5. The ADB guidelines stipulate addressing environmental concerns, if any, of a proposed activity in the initial stages of project preparation. For this, the ADB SPS categorizes the proposed projects into various categories (A, B or C) to determine the level of environmental assessment required to address the potential impacts. Level of environmental assessment required for each category is presented below.
 - (i) Category A: Projects with potential for significant adverse environmental impacts. An Environmental Impact Assessment (EIA) is required to address significant impacts.
 - (ii) Category B: Projects likely to have some adverse environmental impacts, but of lesser degree and/or significance than those for Category A. An initial environmental examination (IEE) is required to determine whether significant environmental impacts warranting an EIA are likely. If an EIA is not needed, the IEE is regarded as the final environmental assessment report.
 - (iii) Category C: Projects unlikely to have adverse environmental impacts. No EIA or IEE is required, although environmental implications are still reviewed.
- 6. The environmental impacts of Bhilwara sewerage subproject have been identified and assessed as part of the planning and design process. An environmental assessment using ADB's Rapid Environmental Assessment Checklist Sewerage (**Appendix 1**) was conducted, and results of the assessment show that the subproject is unlikely to cause significant adverse impacts. Thus, this IEE has been prepared in accordance with ADB SPS's requirements for environment category B projects.

D. Scope of IEE

7. The IEE was based mainly on secondary sources of information and field reconnaissance surveys; no field monitoring (environmental) survey was conducted. Stakeholder consultation was an integral part of the IEE.

E. Report Structure

8. This Report contains nine (9) sections: (i) Executive summary; (ii) Introduction and regulatory framework (iii) Description of the project (iv) description of the environment; (v) Anticipated environmental impacts and mitigation measures; (vi) public consultation and information disclosure; (vii) Grievance redress mechanism; (viii) Environmental management plan, and, (ix) Conclusion and recommendation.

II. DESCRIPTION OF THE PROJECT

9. Bhilwara is the district headquarters of Bhilwara District in southern part of Rajasthan State. It is situated at about 250 km southwest of State Capital, Jaipur. The municipal area under the jurisdiction of Bhilwara Nagar Parisgad (BNP) extends to an area of 69 sq. km, housing a population of 359,483 (as per Census 2011). Bhilwara is one of the six project towns selected for implementation of the ADB funded Rajasthan Urban Sector Development Program (RUSDP).

A. Present Situation

- 10. Water Supply. At present, Bhilwara Town meets its water demand from both surface water as well as groundwater sources. Groundwater is extracted from 21 tube wells at Kankroliya Ghati (14 MLD), and surface water is sourced from Meja Dam and Guwaradi Dam (15.5 MLD). Raw water is treated at 27.4 MLD capacity water treatment plant in the city. Total storage capacity available is 15.82 ML. Treated water from WTP is collected in clear water reservoirs (CWRs) and pumped to zonal elevated service reservoirs (ELSRs) for distribution by gravity. Water is distributed through a network of 616 km with 48,932 house service connections. About 78% of the population is provided within this water supply system and the rest are depending on their own system of bore wells and public hand pumps. Water is supplied once in three days for about 1.5 hours. While gross water supply rate is over 82 litres per capita per day (LPCD), the water provided at consumer end is about 60 LPCD, which is less than standard of 135 LPCD. This is due to heavy losses in the existing distribution network. The water transmission and distribution network consisting AC pipes is old, profusely leaking and is badly in need of rehabilitation. At present, PHED is implementing a project to improve the water supply system in Bhilwara and is likely to be completed by the end of 2015.
- 11. **Sewerage.** At present there is no sewerage system in the town, due to which most of the households depend on septic tanks for disposal of sewage. Effluent from septic tanks and sullage, and sewage from houses without septic tanks is let off into open drains which ultimately collect in low lying areas in the outskirts of the town. Accumulated wastewater is partially pumped to a sewage treatment plant of 10 MPD developed and operated by a private industry (Jindal Industries) that reuses the treated wastewater.
- 12. Bhilwara Nagar Parishad has prepared a Detailed Project Report with support of Rajasthan Urban Infrastructure Development and Finance Corporation (RUIDFC) for the financial assistance of centrally sponsored Urban Infrastructure Development in Small and Medium Towns (UIDSMT) scheme. The DPR has not yet approved by the government. Also, Jindal industries have proposed construction another 10 MLD capacity STP adjacent to the existing STP on municipal land in agreement with the Bhilwara Nagar Parishad. This will be taken up by the end of 2014, and will be commission in early 2016.

B. Infrastructure Improvements Proposed in Bhilwara under RUSDP

- 13. **Sewerage**. Sewage collection and conveyance network is proposed for Bhilwara city under this RUSDP. This will collect sewage from houses and convey to the STPs of Jindal Industries (10 MLD existing + 10 MLD proposed) for treatment and reuse. The proposed sewer network will cater to the entire town, barring the outer areas with low population density (100 persons/hectare). Of the total base year population (2016) of 391,882, this subproject will cover 75% of the population. It has been the experience of RUIDP that though sewage network is made available, not all houses will connect to the sewer network immediately, and it will take considerable time to achieve 100% connections. Therefore it is assumed that about 60% houses will be connected to the network where it is available, so the overall houses connected to sewage at town level will be 45%. The total sewage generation from these 45% houses will be about 20 MLD, which is equivalent to the available STP capacity. As the connection rate increases, additional STP modules need to be added to take care of the additional sewage generation.
- 14. The rest of the population, which include houses not connected to the sewerage system

though it is made available, and also people residing in the outer areas with low population density, will continue to depend on individual septic tank and soak pit arrangements. The sewer system will be designed as a separate sewer system that carries only the domestic wastewater, the open drain system that exists in the town will cater to storm runoff. No industrial wastewater will be allowed into the sewers.

15. This subproject complies with the environmental subproject selection criteria agreed between the government and the ADB (Compliance checklist is at Appendix 7). Following Table 2 shows the nature and size of the various components of the subproject. Conceptual layout plans are shown in Figures 1 to Figure 2.

Infrastructure Function Description Location 1. Water Supply 2. Sewerage Sewer Collect New Sewer network will network and wastewater from 558 km; 200 to 1100 mm diameter cover entire area dwelling units DWC pipes for sewers and MDPE barring the outer areas house and convey by for house connections (35,000 with low population connections gravity to the density no.s) STP

Table 2: Proposed Sewerage Subproject & Components

DWC = Double Wire Corrugated; MDPE = Medium Density Polyethylene

- 16. Excavation for the sewer laying works will be undertaken through open trenching, which will be maximum width of 1 m only on one side of the road ROW with maximum length, an average, of 70 m per day. Excavation, laying of sewers and backfilling will be completed within the 3 days. Subsequent to completion of works, road reinstatement will be undertaken by the contractor as part of the civil works. The same shall be mentioned in the bid document to make it binding on the contractor.
- 17. The subproject is primarily designed to improve environmental quality and living conditions of Bhilwara through provision of sewerage system. The benefits arising from this subproject include: (i) better public health particularly reduction in waterborne and infectious diseases; (ii) reduced risk of groundwater contamination; (iii) reduced risk of contamination of treated water supplies; and, (iv) improvement in quality of water bodies due to disposal of treated effluent meeting disposal standards.

C. Investment Program Implementation Schedule

18. The detailed design of this subproject will be completed by May 2014. After the approval, bid will be prepared and tenders invited by September 2014, and the contract will be awarded by January 2015. Construction is likely to start in February 2015, and will take about 36 months, i.e. the construction work is likely to be completed by February 2018.

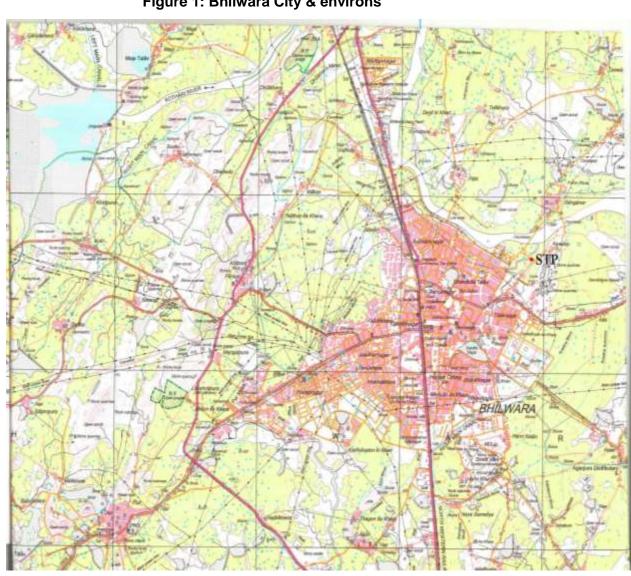


Figure 1: Bhilwara City & environs

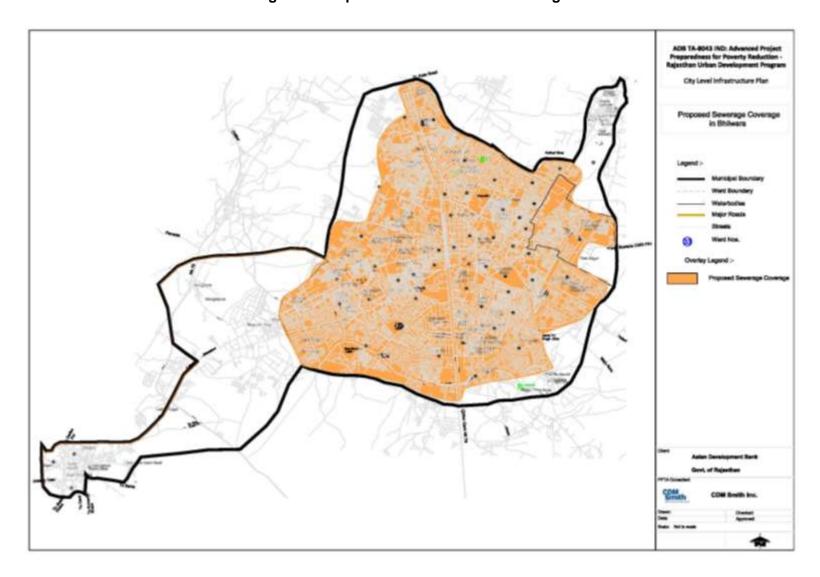


Figure 2: Proposed Sewer Network Coverage

III. DESCRIPTION OF THE ENVIRONMENT

A. Physical Resources

Location, Area & Connectivity

- 19. Bhilwara is the headquarter of Bhilwara District in the southern part of Rajasthan State. It is the centre of administration, trade, commerce and, industry in the region. Located on the southern edge of Aravali hills, Bhilwara is situated at a distance of 250 km southwest of Jaipur. Geographically, it is is situated at 25.35°N Longitude and 74.63°E Latitude about 421 m the mean sea level (MSL). Bhilwara has good road connectivity to its surrounding towns and cities through National Highways 76 & 79 (NH 76 & 79). The town is also well connected with railway network. Nearest airport is at Udaipur, about 165 km from Bhilwara.
- 20. Bhilwara Nagar Parishad's (BNP) jurisdiction extends up to an area of 69 sq. km, housing a population of 359,483 (as per Census 2011). Municipal area is divided into 50 municipal wards for administrative purposes.

Topography, Soils and Geology

21. The district generally consists of an elevated plateau. The eastern position of the district as a cluster of hills. The district is intersected by the Aravali ranges at several places. There is a range of hills in the North-East corner of the district, which extends right up to Jahajpur Town. Bhilwara City topography is predominantly plain with low level hills of rocky knobs spanning from west to north. General slope of the town is towards northeast direction. Kothari River flows in the northern side from west to east, about 5 km from the town. Town mostly drains into this River. Predominant soil types in the city are Clay loam or medium black (in northeastern hilly areas), loam (predominant soil type) and, sand and sandy loam (near the banks of rivers/streams). The origin of landform is fluvial (alluvial) along River Kothari, dunudational (buried pediment) in most places, and structural hills in the northeastern outskirts of the city. Predominant geological formation includes rock types belonging to Bhilwara Super group, Aravallis and Vindhyan Super group. The depth of soil varies from 5 to 10 m, and in some areas rock outcrops are seen above the ground.

Seismology

22. As per the seismic zoning map of India, Bhilwara falls under the Zone II, which is the lowest earthquake risk zone in India. This zone is termed as "low damage risk zone".

Climatic Conditions

- 23. Bhilwara experiences semi-arid hot climate with dry hot summers and cold winters. The cold season is from December to February and is followed by hot summers from March to the last week of June. The south west Monsoon season which follows, last till about mid-September. The period from mid-September to about the end of November constitutes the post monsoon season. Winter seasons are normally pleasant, and January is the coldest month with mean maximum and minimum temperatures of 22.2°C and 7.3°C.
- 24. Bhilwara receives rainfall mainly under the influence of southwest monsoon between July and September. Mean annual rainfall of Bhilwara is 633.9 mm. Almost 95% of the total annual rainfall is received during the southwest monsoon, which enters the district in the last

week of June and withdraws in the middle of September. Temperature drops with the onset of monsoon and rises again in the month of September. The summer temperature reaches 46° C in May / June and average temperature is about 32° C.

Surface Water

- 25. Bhilwara is located near the right bank of River Kothari, a tributary of River Banas, an important river of Rajasthan. River Kothari originates in the eastern slopes of the Aravali ranges in Rajsamand District. The river flows through Rajsamand and Bhilwara Districts for about 51 km in a hilly region, and 100 km through plains, before joining the Banas near Nandrai village in Bhilwara District. The other tributaries of Banas in Bhilwara District are Bedach and Khari. River is rain-fed and is a seasonal flowing river. River carries good flow during normal and above normal rainfall years. Meja Baandh (Meja Dam) constructed across Khari River, about 20 km northwest of Bhilwara is an important source of water for irrigation, industrial and drinking purposes.
- 26. There are small lakes and ponds in the city. Gandhisagar Lake and Dhandola Lake are located within the city. Lakes mostly river wastewater from surrounding areas except during monsoon. Besides, there are several small ponds in the city, which are mostly dry.
- 27. Kothari River, downstream of Meja Dam, particularly the stretch in the town is polluted due to entry of industrial and domestic wastewater. Bhilwara is textile city, and houses hundreds of textile units engaged in textile processing, spinning and weaving.

Groundwater

- 28. Major water bearing formations are gneiss and schist (Bhilwara Supergroup); gneiss, schist, phyllite, slate and limestone (Aravalli Supergroup); sandstone, shale and limestone (Vindhyan Supergroup) and alluvium. Ground water occurs under unconfined to semi-confined condition. Weathered zone below the water table acts as a good storage. The joints, fissures and other plains of structural weakness as well as their extent, size, opening and inter connection control occurrence & movement of ground water. Phyllites and schists are predominating in Bhilwara City and these formations are intercalated with dolomitic limestone, quartzite and basic intrusives. Yield of wells vary from 30 to 45 m3/day. The depth to water level during the pre-monsoon period is 12.55 14.15 m and during post monsoon is 1.87 2.65 m. Alluvium area is restricted to riverbeds. The transmissivity of aquifer tapping in alluvium areas is confined to Banas River and varies from 499 to 3,108 m2/day, whereas in hard rock areas it varies from 8.08 to 230 m2/day.
- 29. In the greater part of the district including Bhilwara City, ground water quality in shallow aquifer is good with electrical conductance less than 2,000 mmhos/cm. Here water of high electrical conductance occurs in small isolated patches (Vijay Singh Pathik Nagar in Bhilwara City has EC value of 5640 micromhos/cm). Fluoride concentration in groundwater exceeding permissible limit (1.5 mg/l) in several places in the district including Bhilwara City. Besides, due to indiscriminate disposal of effluents textile units in the City, groundwater especially along Khari River is highly polluted.

Air Quality

30. Bhilwara is an industrial city with several textile units with problematic air emissions. City is famous for its textile industries engaged in processing, dying, sewing and printing activities.

Besides water pollution, textile units emit air pollutants predominantly from boilers and ovens, and usually generate oxides of nitrogen (NOx) and oxides of sulphur (Sox). Due to dry weather and bad road conditions, particulate matter is likely to be high, particularly during summer dust storms driven by relatively strong north-west to south-west winds.

31. Ambient air quality in Rajasthan is monitored by Rajasthan Pollution Control Board. However, at present there is no monitoring station in Bhilwara despite heavy industrial presence, and therefore no data on ambient air quality available. Traffic, bad roads coupled with dry weather, and industry is the significant polluting activities, so levels of particulate matter (PM) are likely to be high.

B. Ecological Resources

- 32. Forest and ecological resources in Bhilwara District is very limited; only about 7% of total geographical area of the district is under the forest cover. These are open forests and fall under the subsidiary and dry tropical category. The principal tree species are native include Jaal (Salvadora oleoides), Babul (Acacia nilotica) and Khair (Acasia catechu). There are two reserve forest areas near the City (i) Dense mixed hilly forest area near Kheri on the banks of River Khedi, about 10 km north of the city; and (ii) open forest in the rocky hills near Lakhmipura village, about 5 km west of the city. These forest are mostly with native species of Jaal, Bahul and Khair. Since these forest areas are located away from the city, none of the proposed project components are located near the forests. There are no eco-sensitive areas in the region.
- 33. Proposed subproject components are located in Bhilwara City, an urban area located in semi-arid dry region. City area is mostly characterized by dense habitation, there is no natural habitat left in these places. Outer municipal area includes partly rugged terrain undulated by short ridges and agricultural lands.

C. Economic Development

Land use

34. Bhilwara Master Plan 2005 provides land use details of 2,775 ha area which was then the municipal area. The municipal area is subsequently expanded, and now stands at 6,900 ha. Of the 2775 ha, 97.2 percent is classified as developed area and the rest comprises agricultural land and water bodies. Predominant land use residential, followed by industrial land use. There are no forest areas in the municipal limit. The overall density of the town is 5,210 persons/sq. km.

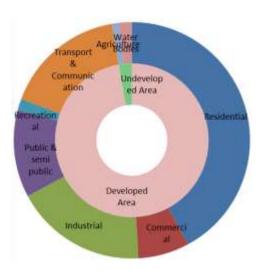


Table 3: Existing Land Use of Bhilwara Town (2011)

Category	Area in Hectares	Percentage to Total Developed Area	Percentage to Total Municipal Area
Residential	1, 167.9	43.3	42.1
Commercial	193.9	7.2	7.0
Industrial	500.6	18.6	18.1

Category	Area in Hectares	Percentage to Total Developed Area	Percentage to Total Municipal Area
Public & Semi Public	331.1	12.3	11.9
Recreational	43.3	1.6	1.6
Transport & Communication	460.1	17.1	16.6
Total Developed Area	2,696.9	100.0	97.3
Agricultural	26.7		1.0
Water Bodies	48.6		1.8
Total Municipal Area	2,772		100.0

Source: Bhilwara Master Plan, 2005

Industry & Agriculture

- 35. Bhilwara City is one of the most important industrial centres in Rajasthan. The region is the hub of textile industries in the state and Bhilwara is well known as "Textile City" and also "Industrial City". The major industry is textiles, with more than 400 units in the City. The main textile product is synthetic fabric used in trousers. The town boasts of producing around a billion meters per annum of trouser fabric, making Bhilwara one of the major textile centres in India. Industries are mostly located in the northern and southern outskirts of the city along Chittorgarh Road, Gangapur Road and Mandal Roa. There are nine large and several medium and small scale spinning mills. In the weaving sector, there are nearly 13,500 looms.
- 36. Owing to availability of several mineral resources such as mica, soapstone, copper, feldspar, quartz, white clay and Garnet, Bhilwara District is called as "Zoo of Minerals". There is large-scale mining of sandstone, soapstone and other minerals like feldspar, quartz, China clay, etc. There are several other industries food and agro based, tobacco, wood, paper, leather, plastic, chemical, mineral-based, machine tools, electrical etc. Bhilwara is the only center in the country producing insulation bricks. There are about 33 units in town.
- 37. Bhilwara also depends on agriculture. Its main crops are millets, pulses, sesame and red chilies. About 5% of the city population is dependent on agricultural and allied activities. Kharif sowing is done at the beginning of the monsoon, which normally arrives in Bhilwara in the last week of June. Kharif crops constitute bulk of the food production in the district, as the agricultural activities are mostly dependent on Monsoon. Rabi crops are sown from November to March.

Infrastructure

38. Water Supply. At present, Bhilwara Town meets its water demand from both surface water as well as groundwater sources. Groundwater is extracted from 21 tube wells at Kankroliya Ghati (14 MLD), and surface water is sourced from Meja Dam and Guwaradi Dam (15.5 MLD). Raw water is treated at 27.4 MLD capacity water treatment plant in the city. Total storage capacity available is 15.82 ML. Treated water from WTP is collected in clear water reservoirs (CWRs) and pumped to zonal elevated service reservoirs (ELSRs) for distribution by gravity. Water is distributed through a network of 616 km with 48,932 house service connections. About 78% of the population is provided within this water supply system and the rest are depending on their own system of bore wells and public hand pumps. Water is supplied once in three days for about 1.5 hours. While gross water supply rate is over 82 litres per capita per day (LPCD), the water provided at consumer end is about 60 LPCD. At present, PHED is implementing a project to improve the water supply system in Bhilwara and is likely to be

completed by the end of 2015.

- 39. **Sewerage.** At present there is no sewerage system in the town, due to which most of the households depend on septic tanks for disposal of sewage. Effluent from septic tanks and sullage, and sewage from houses without septic tanks is let off into open drains which ultimately collect in low lying areas in the outskirts of the town. Accumulated wastewater is partially pumped to a sewage treatment plant of 10 MPD developed and operated by a private industry (Jindal Industries) that reuses the treated wastewater.
- 40. **Solid Waste Management**: Bhilwara Nagar Parishad (BNP) collects solid waste via door-to-door collection systems through an NGO and BNP staff from all municipal wards. Coverage is about 83% population. The total solid waste generation is about 100 tons per day. Waste from community dust bins/open collection points is manually lifted into vehicles for transportation to the disposal site near Khir Kheda, which is about 11 km from the city. BNP developed a composting facility with 75 tons per day capacity in 2009, however, it is currently non-functional. The unsegregated waste collected from the city is disposed-off by crude open dumping method at the site. There is no landfill facility in the city.
- 41. **Storm Water Drainage:** Drainage system in the form of road-side open drains, and major drains that convey runoff from the city collector drains to natural water bodies is developed in Bhilwara. The total length of roadside drains is 725 km, which is about 93% of the total length of roads. Besides, there are five major drains of total length of 15.8 km in the city. Due to lack of sewerage system, these drains primarily carry sullage and sewage discharged by households. Industrial waste also disposed illegally into these drains at some places. These drains ultimately discharge into River Kothari.
- 42. **Power Supply:** Thermal power is the main source of energy in Rajasthan, contributing nearly 90% of the electricity, compared to hydropower, which produces the remainder. State-level companies (Rajya Vidyut Utpadan Nigam Ltd, RVUN; and Rajya Vidyut Prasaran Nigam Ltd, RVPN) are responsible for power generation and transmission respectively, and distribution is provided by a regional company, the Ajmer Vidyut Vitaran Nigyam Limited (AVVNL). Power is supplied from the central grid by overhead cables carried on metal and concrete poles, mainly located in public areas alongside roads. The power supply in the state is continuous and reliable, except in warmer months with periodic outages in warmer months, and large fluctuations in voltage.
- 43. **Transport:** The old city area is characterized by very narrow roads that are frequently congested with traffic and pedestrians. In contrast the remainder of the town has a relatively good road system, particularly in the outer areas, where streets are wide and not heavily used by traffic. The total road length in the town is 783 km, consisting of bitumen/tar roads, cement concrete roads and gravel roads. Most of the roads are maintained by BNP, while major intercity roads and highways are maintained by the Public Works Department (PWD) or National Highway Authority of India. Road the condition is generally poor, with many roads in need of repairs and resurfacing. This plus the absence of parking spaces and pedestrian walkways leads to slow traffic and congestion. Transport in the city is mainly by personal vehicles (cars and motorcycles) and motor- and bicycle-rickshaws. The Rajasthan State Road Transport Corporation (RSRTC) runs public buses to neighboring villages and towns and to larger towns, such as Ajmer, Kota, Udaipur and Jaipur, with which there are good road connections.

D. Socio Cultural Resources

Demography

- 44. Bhilwara population, as per 2011 census, is 359,483, grown from 280,641 in 2001, registering an annual average growth rate of 2.53% (decadal growth rate of 28.3%). which is slightly lower than the state urban population growth rate of 2.58% during the same decade. In the previous decade of 1991-2001, Bhilwara experienced a much higher population growth rate of 52.3%. Gross population density of the city is 52 persons/ha. Population density varies widely across the town the central, old areas of the town have high density, and the outer areas are sparsely developed. Average household size of Bhilwara is 6.6 persons.
- 45. Sex ratio of the town is 915 females per 1000 males. This is lower than Bhilwara district's sex ratio (969), and the state-level figure of 928. Literacy rate is 71.5% (Census 2011), which is higher than the state literacy rate of 66.11%. In Bhilwara, male and female literacy rate is recorded as 77.8% and 64.7% respectively. Scheduled Caste (SC) population comprises 14.5 percent of the total population. Workforce participation rate in Bhilwara is 32 percent, which is higher the State level WPR of 29.6%.
- 46. Largest proportion of population comprises Hindus followed by Muslims, Jains and Christians. Main languages spoken are Rajasthani, and Hindi.

History, Culture and Tourism

- 47. As per the legends, Bhilwara was established in the middle of the 11th century by Bhil Tribe, and therefore the name "Bhilwara". It is also believed that Bhil tribes built a Shiva Temple on the site of the existing Jataun ka Mandir, which is located at Old Bhilwara or Bhilwara Gaon, the oldest part of the City. It is also said that Bhil tribes were eventually driven away by local peasants from Bhilwara. Bhilwara was formed as a separate district in 1949 when the princely States of Mewar and Shahpura Thikana are merged with erstwhile United Rajasthan. Another school of thought on the origin is that this city had a mint, where coins known as 'Bhiladi' were minted and this place is came to known as Bhilwara. Mandal Town, located at about 16 km from Bhilwara, is said to be the base of Mughals when they attacked Chittorgarh.
- 48. Bhilwara history is also traced back to New Stone Age period, Bagor village, about 25 km from Bhilwara is a prominent place of Stone Age Art. There are several temples in the district that dates back to 12th and 13th century.
- 49. Following are located within the town, and attract tourists/pilgrims from the region. There are no protected (state or central) monuments in Bhilwara City.
 - (i) **Pur Udan Chatri** is about 10 km from Bhilwara city. It is famous for Udan Chatri, Adhar Sheela Mahadev where a huge rock is resting on a small one.
 - (ii) **Jataun ka Mandir** situated in the old town area
 - (iii) **Battis Khambon ki Chhatri**, Mandal (16 km from the City). As the name implies, this is a handsome chhatri made of sandstone with 32 pillars, with beautiful carving at the base and at the upper portion.
 - (iv) Harni Mahadev: Founded by the ancestors of the Darak family, a Shivling lies

under the mountain, built into a Shiva temple and is 8 km from the city. It got the name Harni on the name of village near it, a nice place for people from the city for outing as it has hills around. On the occasion of Shiv Ratri a three-day fair is held here. Near this Chamunda mata Mandir is a hill from where one can have a view of whole city. Dadi dham temple is also there on the way.

E. Environmental Settings of Investment Program Component Sites

50. The subproject includes laying of sewer pipes in the municipal area of Bhilwara City. Sewers will be laid along the roads/streets in the town within the road right of way (ROW). In wider roads pipes/sewers will be laid in the road shoulder beside the tarmac, and in narrow roads, where there is no space, sewers will be laid in the road carriage way by break opening the tarmac. Roads in some part of the town are narrow. Roads are lined both sides with open drains. In narrow roads ewers will be laid in the middle of the road, which may affect the traffic. Bigger diameter trunk sewers will be laid along the main roads, which are wide and have adequate space. No tree cutting is anticipated as there is adequate space to lay the sewer in those roads.

IV. ANTICIPATED ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Introduction

- 51. Potential environmental impacts of the proposed infrastructure components are presented in this section. Mitigation measures to minimize/mitigate negative impacts, if any, are recommended along with the agency responsible for implementation. Monitoring actions to be conducted during the implementation phase is also recommended to reduce the impact.
- 52. Screening of potential environmental impacts are categorized into four categories considering subproject phases: location impacts and design impacts (pre-construction phase), construction phase impacts and operations and maintenance phase impacts.
 - a. **Location impacts** include impacts associated with site selection and include loss of on-site biophysical array and encroachment either directly or indirectly on adjacent environments. It also includes impacts on people who will lose their livelihood or any other structures by the development of that site.
 - b. **Design impacts** include impacts arising from Investment Program design, including technology used, scale of operation/throughput, waste production, discharge specifications, pollution sources and ancillary services.
 - c. **Construction impacts** include impacts caused by site clearing, earthworks, machinery, vehicles and workers. Construction site impacts include erosion, dust, noise, traffic congestion and waste production.
 - d. **O&M impacts** include impacts arising from the operation and maintenance activities of the infrastructure facility. These include routine management of operational waste streams, and occupational health and safety issues.
- 53. Screening of environmental impacts has been based on the impact magnitude (negligible/moderate/severe in the order of increasing degree) and impact duration (temporary/permanent).
- 54. This section of the IEE reviews possible project-related impacts, in order to identify issues requiring further attention and screen out issues of no relevance. ADB SPS (2009)

require that impacts and risks will be analyzed during pre-construction, construction, and operational stages in the context of the project's area of influence.

- 55. The ADB Rapid Environmental Assessment Checklist in http://www.adb.org/documents/guidelines/environmental_assessment/eaguidelines002.asp has been used to screen the project for environmental impacts and to determine the scope of the IEE.
- 56. In the case of this project (i) most of the individual elements are relatively small and involve straight forward construction and operation, so impacts will be mainly localized and not greatly significant; (ii) most of the predicted impacts are associated with the construction process, and are produced because that process is invasive, involving excavation and earth movements; and (iii) being located in an urban area, will not cause direct impact on biodiversity values. The project will be in properties held by the local government and access to the project location is through public rights-of-way and existing roads hence, land acquisition and encroachment on private property will not occur.

B. Pre-Construction Impacts

- 57. **Design of the Proposed Components**. The Central Public Health and Environmental Engineering Organization (CPHEEO) manual suggests a design period of 15/30 years³ in general while designing the systems for water supply and sewerage components. It is proposed to consider 2046 as the design year for all the components in order to maintain unanimity in the design period and design population. Accordingly, 2016 shall be the base year and 2031 the intermediate year to cross check the designs pertaining to intermediate demand. The rate of water supply has been taken as 135 lpcd for 100% population. Sewage generation is 85% of water supply (including 5% to account for infiltration).
- 58. One of the critical aspects in sewerage system operation is, change in raw sewage characteristics at inlet of sewage treatment plant may affect the process and output quality. STPs are designed for municipal wastewater, which does not include industrial effluent. Characteristics of industrial effluent widely vary depending on the type of industry, and therefore disposal of effluent into sewers may greatly vary the inlet quality at STP, and will upset process and affect the efficiency. Although legally the disposal of effluent meeting certain standards is allowed into municipal sewers (refer **Appendix 4**), the monitoring of the same is not-practical. There are several industries in the town with problematic water discharges, and therefore disposal of such wastewater into sewers will affect the treatment efficiency. Following measures should be incorporated:
 - (i) No industrial wastewater shall be allowed to dispose into municipal sewers
 - (ii) No domestic wastewater from industrial units shall be allowed into municipal sewers
 - (iii) Ensure that there is no illegal discharge through manholes or inspection chambers
 - (iv) Conduct public awareness programs; in coordination with RPCB, issue notice to all industries for compliance
 - (v) Conduct regular wastewater quality monitoring (at inlet and at outlet of STP) to ensure that the treated wastewater quality complies with the national effluent

³ As per CPHEEO, pumps, motors, STP, storage reservoirs are to be designed for a life of 15 years.

standards

- 59. **Sewer system collection & conveyance.** The sewerage system is designed as a separate system of sewage collection (i.e. caters only to wastewater). There is considerable length of existing surface drains in the project area that can be used for disposal of storm runoff. The underground gravity sewers will carry sewage from households to trunk sewers and further to STPs. To maximize the benefits as intended, Bhilwara Nagar Parishad should ensure that all existing septic tanks are phased out by bypassing the inlet and connecting the toilet discharge from each house directly to sewerage system.
- 60. Accumulation of silt in sewers in areas of low over time, overflows, blockages, power outages, harmful working conditions for the workers cleaning sewers etc. are some of the issues that needs to be critically looked into during the sewer system design. A properly designed system is a must for system sustainability.
- 61. Measures such as the following shall be included in sewer system design to ensure that the system provides the benefits as intended:
 - (i) Limit the sewer depth where possible
 - (ii) Sewers shall be laid away from water supply lines and drains (at least 1 m, wherever possible);
 - (iii) In all cases, the sewer line should be laid deeper than the water pipeline (the difference between top of the sewer and bottom of water pipeline should be at least 300 mm)
 - (iv) In unavoidable, where sewers are to be laid close to storm water drains, appropriate pipe material shall be selected (stoneware pipes shall be avoided)
 - (v) For shallower sewers and especially in narrow roads, use small inspection chambers in lieu of manholes;
 - (vi) Design manhole covers to withstand anticipated loads & ensure that the covers can be readily replace if broken to minimize silt/garbage entry
 - (vii) Ensure sufficient hydraulic capacity to accommodate peak flows & adequate slope in gravity mains to prevent buildup of solids and hydrogen sulfide generation
 - (viii) Equip pumping stations with a backup power supply, such as a diesel generator, to ensure uninterrupted operation during power outages, and conduct regular maintenance to minimize service interruptions. Consider redundant pump capacity in critical areas
- 62. **Utilities**. Telephone lines, electric poles and wires, water lines within the proposed project locations may require to be shifted in few cases. To mitigate the adverse impacts due to relocation of the utilities, the contractor, in collaboration with ULB will (i) identify the locations and operators of these utilities to prevent unnecessary disruption of services during construction phase; and (ii) instruct construction contractors to prepare a contingency plan to include actions to be done in case of unintentional interruption of services.
- 63. **Social and Cultural Resources**. Any work involving ground disturbance can uncover and damage archaeological and historical remains. For this project, excavation will occur in project sites, so it could make medium risk of such impacts if the site contains any archeological and historical remains. Nevertheless, PIU will:

- (i) consult Department of Archaeology and Museums to obtain an expert assessment of the archaeological potential of the site;
- (ii) consider alternatives if the site is found to be of high risk;
- (iii) include state and local archaeological, cultural and historical authorities, and interest groups in consultation forums as project stakeholders so that their expertise can be made available; and
- (iv) develop a protocol for use by the construction contractors in conducting any excavation work, to ensure that any chance finds are recognised and measures are taken to ensure they are protected and conserved.
- 64. **Site selection of construction work camps, stockpile areas, storage areas, and disposal areas**. Priority is to locate these near the project location. However, if it is deemed necessary to locate elsewhere, sites to be considered will not promote instability and result in destruction of property, vegetation, irrigation, and drinking water supply systems. Residential areas will not be considered for setting up construction camps to protect the human environment (i.e., to curb accident risks, health risks due to air and water pollution and dust, and noise, and to prevent social conflicts, shortages of amenities, and crime). Extreme care will be taken to avoid disposals near forest areas, water bodies, swamps, or in areas which will inconvenience the community.
- 65. **Site selection of sources of materials**. Extraction of materials can disrupt natural land contours and vegetation resulting in accelerated erosion, disturbance in natural drainage patterns, ponding and water logging, and water pollution. To mitigate the potential environmental impacts, locations of quarry site/s and borrow pit/s (for loose material other than stones) would be assessed by PIU. Priority would be sites already permitted by Mines and Geology Department. If new sites are necessary, these would be located away from population centers, drinking water intakes and streams, cultivable lands, and natural drainage systems; and in structurally stable areas. It will be the construction contractor's responsibility to verify the suitability of all material sources and to obtain the approval of Department of Mines & Geology and local revenue administration. If additional quarries will be required after construction is started, then the construction contractor shall use the mentioned criteria to select new quarry sites, with written approval of PIU.

C. Construction Impacts

- 66. The civil works for the subproject include earth work excavation for sewer trenches, sewer laying, construction manholes, shifting of public utilities and providing house service connections. Earth work excavation will be undertaken by machine (backhoe excavator) and include danger lighting and using sight rails and barricades at every 100 m., while sewer laying works will include laying sewer at required gradient, fixing collars, elbows, tees, bends and other fittings including conveying the material to work spot and testing for water tightness.
- 67. The maximum depth for sewers depends on the design, and in Bhilwara most of the sewers will be laid 1.2 to 2 m below the ground, and some sewers will be laid deeper (> 2m) and maximum depth will be 5m. Sufficient care will be taken while laying so that existing utilities and cables are not damaged and pipes are not thrown into the trenches or dragged, but carefully laid in the trenches. Trenches deeper than 2 m will be protected by bracings to avoid collapse of trenches, and also to avoid any risk to surrounding buildings. Once they are laid, pipes will be joined as per specification and then tested for any cracks of leakages. The minimum working hours will be 8 hours daily, the total duration of each stage depends on the soil condition and other local features. The excavation of trenches for sewers is estimated to

generate 977,058 cubic meters, of which about 82% will be used for refilling, and the remaining 172,224 cubic meters needs to be disposed of. This soil shall be used for filling low lying area or stored/ dumped in approved debris disposal sites. The beneath and sides of sewers in trench will be filled with sand to form cushion/bed for sewer, and the sand requirement is estimated as 127,745 cubic meter.

- 68. Although construction of these project components involves quite simple techniques of civil work, the invasive nature of excavation and the project locations in the built-up areas of the town where there are a variety of human activities, will result in impacts to the environment and sensitive receptors such as residents, businesses, and the community in general. These anticipated impacts are temporary and for short duration.
- 69. Physical impacts will be reduced by the method of working and scheduling of work, whereby the project components will be (i) constructed by small teams working at a time; (ii) any excavation done near sensitive area like school, religious places and house will be protected as per standard norms etc.
- 70. **Sources of Materials**. Significant amount of gravel, sand, coarse aggregate, and cement will be required for this project. The construction contractor will be required to:
 - (i) Use material sources permitted by government;
 - (ii) Verify suitability of all material sources and obtain approval of PIU; and
 - (iii) Submit to PIU on a monthly basis documentation of sources of materials.
- 71. **Air Quality**. Emissions from construction vehicles, equipment, and machinery used for excavation and construction will induce impacts on the air quality in the construction sites. Anticipated impacts include dusts and increase in concentration of vehicle-related pollutants such as carbon monoxide, sulfur oxides, particulate matter, nitrous oxides, and hydrocarbons. These however will be temporary limiting to construction activities only. To mitigate the impacts, construction contractors will be required to:
 - (i) Consult with PIU/ on the designated areas for stockpiling of, soils, gravel, and other construction materials:
 - (ii) Damp down exposed soil and any stockpiled material on site by water sprinkling;
 - (iii) Use tarpaulins to cover sand and other loose material when transported by trucks;
 - (iv) Clean wheels and undercarriage of haul trucks prior to leaving construction site
 - (v) Don't allow access in the work area except workers to limit soil disturbance and prevent access by barricading and security personnel
 - (vi) Fit all heavy equipment and machinery with air pollution control devices which are operating correctly
- 72. **Surface Water Quality**. Run-off from stockpiled materials, and chemical contamination from fuels and lubricants during construction works can contaminate downstream surface water quality of the streams. These potential impacts are temporary and short-term duration only. However, to ensure that these are mitigated, construction contractor will be required to:
 - (i) Prepare and implement a spoils management plan (**Appendix 8**);
 - (ii) Avoid stockpiling of earth fill especially during the monsoon season unless covered by tarpaulins or plastic sheets;

- (iii) Prioritize re-use of excess spoils and materials in the construction works. If spoils will be disposed, consult with PIU on designated disposal areas;
- (iv) Install temporary silt traps or sedimentation basins along the drainage leading to the water bodies;
- (v) Place storage areas for fuels and lubricants away from any drainage leading to water bodies:
- (vi) Dispose any wastes generated by construction activities in designated sites; and
- (vii) Conduct surface quality inspection according to the Environmental Management Plan (EMP).
- 73. **Noise and Vibration Levels**. Construction works will be conducted along the roads in Bhilwara urban area, where there are houses, schools and hospitals, religious places and small-scale businesses. The sensitive receptors are the general population in these areas. Increase in noise level may be caused by excavation, particularly breaking of cement concrete or bitumen roads, operation of construction equipment like concrete mixers, and the transportation of equipment, materials, and people. Vibration generated from construction activity, for instance from the use of pneumatic drills, will have impact on nearly buildings. This impact is negative but short-term, and reversible by mitigation measures. The construction contractor will be required to:
 - (i) Plan activities in consultation with PIU so that activities with the greatest potential to generate noise are conducted during periods of the day which will result in least disturbance:
 - (ii) Horns should not be used unless it is necessary to warn other road users or animals of the vehicle's approach;
 - (iii) Minimize noise from construction equipment by using vehicle silencers, fitting jackhammers with noise-reducing mufflers, and use portable street barriers to minimise sound impact to surrounding sensitive receptor; and
 - (iv) Maintain maximum sound levels not exceeding 80 decibels (dBA) when measured at a distance of 10 m or more from the vehicle/s.
 - (v) Identify any buildings at risk from vibration damage and avoiding any use of pneumatic drills or heavy vehicles in the vicinity;
 - (vi) Consult the custodians of important buildings, cultural and tourism authorities and local communities in advance of the work to identify and address key issues, and avoid working at sensitive times, such as religious and cultural festivals.
- 74. **Landscape and Aesthetics**. The construction works does not envisage any cutting of trees, but it will produce excess excavated earth, excess construction materials, and solid waste such as removed concrete, wood, packaging materials, empty containers, spoils, oils, lubricants, and other similar items. Haphazard disposal of these will have negative impacts on landscape and overall aesthetics. These impacts are negative but are of short-term and reversible by mitigation measures. The construction contractor will be required to:
 - (i) Prepare and implement spoils management plan;
 - (ii) Avoid stockpiling of excess excavated soils;
 - (iii) Coordinate with ULB for beneficial uses of excess excavated soils or immediately dispose to designated areas;
 - (iv) Recover used oil and lubricants and reuse or remove from the sites;
 - (v) Manage solid waste according to the following preference hierarchy: reuse, recycling and disposal to designated areas;

- (vi) Remove all wreckage, rubbish, or temporary structures which are no longer required; and
- (vii) Request PIU to report in writing that the necessary environmental restoration work has been adequately performed before acceptance of work.
- 75. **Surface and Groundwater Quality**. Another physical impact that is often associated with excavation is the effect on drainage and the local water table if groundwater and surface water collect in the voids. In Bhilwara groundwater is much deeper than the proposed trenching depth, and rains are scarce and limited to very short duration during monsoon. However, to ensure that water will not pond in pits and voids near project location, the construction contractor will be required to conduct excavation works in non-monsoon season to the maximum extent possible.
- 76. **Accessibility**. Excavation along the roads, hauling of construction materials and operation of equipment on-site can cause traffic problems. Potential impact is negative but short term and reversible by mitigation measures. The construction contractor will be required to:
 - (i) Prepare and implement a Traffic Management Plan (**Appendix 9**)
 - (ii) Plan transportation routes so that heavy vehicles do not use narrow local roads, except in the immediate vicinity of delivery sites;
 - (iii) Schedule transport and hauling activities during non-peak hours;
 - (iv) Locate entry and exit points in areas where there is low potential for traffic congestion;
 - (v) Keep the site free from all unnecessary obstructions;
 - (vi) Drive vehicles in a considerate manner;
 - (vii) Coordinate with Traffic Police for temporary road diversions and for provision of traffic aids if transportation activities cannot be avoided during peak hours; and
 - (viii) Notify affected sensitive receptors by providing sign boards informing nature and duration of construction works and contact numbers for concerns/complaints.
- 77. Wherever road width is minimal, there will be temporary loss of access to restrains and vehicular traffic (including 2-wheelers) during the laying of pipes. Under those circumstances, contractor shall adopt following measures:
- (i) Inform the affected local population 1-week in advance about the work schedule
- (ii) Plan and execute the work in such a way that the period of disturbance/ loss of access is minimum.
- (iii) Provide pedestrian access in all the locations until normalcy is restored. Provide wooden/metal planks over the open trenches at each house to maintain the access.
- 78. **Socio-Economic Income**. The project components will be located in government land and there is no requirement for land acquisition or any resettlement. Construction works will impede the access of residents to specific site in limited cases. The potential impacts are negative and moderate but short-term and temporary. The construction contractor will be required to:
 - (i) Prepare and implement spoils management plan (**Appendix 8**);
 - (ii) Leave spaces for access between mounds of soil;
 - (iii) Provide walkways and metal sheets where required to maintain access across for people and vehicles;

- (iv) Increase workforce in the areas with predominantly institutions, place of worship, business establishment, hospitals, and schools;
- (v) Consult businesses and institutions regarding operating hours and factoring this in work schedules; and
- (vi) Provide sign boards for pedestrians to inform nature and duration of construction works and contact numbers for concerns/complaints.
- (vii) Notify community/ water users in advance about likely interruptions in water supply.
- (viii) Provide alternate sources of clean water until water supply is restored.
- 79. **Socio-Economic Employment**. Manpower will be required during the 36-months construction stage. This can result in generation of temporary employment and increase in local revenue. Thus potential impact is positive and long-term. The construction contractor will be required to:
 - (i) Employ at least 50% of the labour force, or to the maximum extent, local persons within the 2-km immediate area if manpower is available; and
 - (ii) Secure construction materials from local market.
- 80. **Occupational Health and Safety**. Workers need to be mindful of the occupational hazards which can arise from working in height and excavation works. Potential impacts are negative and long-term but reversible by mitigation measures. The construction contractor will be required to:
 - (i) Comply with all national, state and local labor laws (see **Appendix 7**);
 - (ii) Develop and implement site-specific occupational health and safety (OH&S) Plan which will include measures such as: (a) excluding public from the site; (b) ensuring all workers are provided with and use personal protective equipment; (c) OH&S Training⁴ for all site personnel; (d) documented procedures to be followed for all site activities; and (e) documentation of work-related accidents;
 - (iii) Ensure that qualified first-aid is provided at all times. Equipped first-aid stations shall be easily accessible throughout the site;
 - (iv) Provide medical insurance coverage for workers;
 - (v) Secure all installations from unauthorized intrusion and accident risks;
 - (vi) The project area experiences extreme temperature during summer months of April and May, which may affect the health of workers engaged in construction work. Contractor should take necessary measures during summers including the following:
 - a. Work schedule should be adjusted to avoid peak temperature hours (12 3 PM)

Some of the key areas that may be covered during training as they relate to the primary causes of accidents include (i) slips, trips and falls; (ii) personal protective equipment; (iii) ergonomics, repetitive motion, and manual handling; (iv) workplace transport; and (v) legislation and responsibilities. Training can provide the foundations of competence but it does not necessarily result in a competent worker. Therefore, it is essential to assess staff competence to ensure that the training provided is relevant and effective. Supervision and monitoring arrangements shall be in place to ensure that training has been effective and the worker is competent at their job. The level of supervision and monitoring required is a management decision that shall be based on the risks associated with the job, the level of competence required, the experience of the individual and whether the worker works as part of a team or is a lone worker.

- b. Provide appropriate shade near the work place; allow periodic resting and provide adequate water
- c. Provide necessary medicine and facilities to take care of dehydration related health issues
- (vii) Provide supplies of potable drinking water;
- (viii) Provide clean eating areas where workers are not exposed to hazardous or noxious substances:
- (ix) Provide H&S orientation training to all new workers to ensure that they are apprised of the basic site rules of work at the site, personal protective protection, and preventing injuring to fellow workers;
- (x) Provide visitor orientation if visitors to the site can gain access to areas where hazardous conditions or substances may be present. Ensure also that visitor/s do not enter hazard areas unescorted;
- (xi) Ensure the visibility of workers through their use of high visibility vests when working in or walking through heavy equipment operating areas;
- (xii) Ensure moving equipment is outfitted with audible back-up alarms;
- (xiii) Mark and provide sign boards for hazardous areas such as energized electrical devices and lines, service rooms housing high voltage equipment, and areas for storage and disposal. Signage shall be in accordance with international standards and be well known to, and easily understood by workers, visitors, and the general public as appropriate; and
- (xiv) Disallow worker exposure to noise level greater than 85 dBA for a duration of more than 8 hours per day without hearing protection. The use of hearing protection shall be enforced actively.
- 81. **Community Health and Safety**. Hazards posed to the public, specifically in high-pedestrian areas may include traffic accidents and vehicle collision with pedestrians. Potential impact is negative but short-term and reversible by mitigation measures. The construction contractor will be required to:
 - (i) Plan routes to avoid times of peak-pedestrian activities.
 - (ii) Liaise with PIU in identifying risk areas on route cards/maps.
 - (iii) Maintain regularly the vehicles and use of manufacturer-approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.
 - (iv) Provide road signs and flag persons to warn of on-going trenching activities.
- 82. Central part of the town is characterized by narrow roads. Particularly, the areas located on hill slopes have very narrow roads with sharp turns and are accessible only to pedestrians. Besides impeding the access, the trench excavation and pipe laying will pose safety risks to pedestrians, and the people living in these areas. Though the width (<500 mm) and depth (<750 mm) of trench is minimal, it will pose safety risk, especially for children and elders The construction contractor will be required to:
 - (i) Provide prior information to the local people about the nature and duration of work
 - (ii) Conduct awareness program on safety during the construction work
 - (iii) Undertake the construction work stretch-wise; excavation, pipe laying and trench refilling should be completed on the same day

- (iv) Provide barricades, and deploy security personnel to ensure safe movement of people and also to prevent unnecessary entry and to avoid accidental fall into open trenches
- 83. **Work Camps**. Operation of work camps can cause temporary air and noise pollution from machine operation, water pollution from storage and use of fuels, oils, solvents, and lubricants. Potential impacts are negative but short-term and reversible by mitigation measures. The construction contractor will be required to:
 - (i) Consult PIU before locating project offices, sheds, and construction plants;
 - (ii) Minimize removal of vegetation and disallow cutting of trees:
 - (iii) Provide drinking water, water for other uses, and sanitation facilities for employees;
 - (iv) Ensure conditions of liveability at work camps are maintained at the highest standards possible at all times;
 - (v) Prohibit employees from poaching wildlife and cutting of trees for firewood;
 - (vi) Train employees in the storage and handling of materials which can potentially cause soil contamination;
 - (vii) Recover used oil and lubricants and reuse or remove from the site;
 - (viii) Manage solid waste according to the following preference hierarchy: reuse, recycling and disposal to designated areas;
 - (ix) Remove all wreckage, rubbish, or temporary structures which are no longer required; and
 - (x) Request PMU to report in writing that the camp has been vacated and restored to pre-project conditions before acceptance of work.
- 84. **Social and Cultural Resources**. For this project, excavation will occur at locations known not to have archaeological values, so it could be that there is a low risk of such impacts. Nevertheless, the construction contractor will be required to:
 - (i) Strictly follow the protocol for chance finds in any excavation work;
 - (ii) Request PIU or any authorized person with archaeological/historical field training to observe excavation;
 - (iii) Stop work immediately to allow further investigation if any finds are suspected;
 - (iv) Inform PIU/ACM if a find is suspected, and take any action they require ensuring its removal or protection in situ.
 - (v) Adjacent to religious/historic sites, undertake excavation and construction work in such a way that no structural damage is caused to the building.
- 85. **Debris disposal.** Prior to the commencement of works, contractor shall identify a debris disposal site in consultation with the PIU and adhering to following criteria:
 - (i) The site shall be selected preferably from barren, infertile lands. In case agricultural land needs to be selected, top-soil stripping, stacking and preservation should be undertaken prior to initiation of any activities.
 - (ii) Debris disposal site shall be at least 200 m away from surface water bodies.⁵

⁵ In the absence of site meeting the stipulated criteria, an alternate site can be selected specifying the reasons. In such a case, the construction camp management plan should incorporate additional measures specific to the site

- (iii) No residential areas shall be located within 100 m downwind side of the site.
- (iv) The site is minimum 250 m. away from sensitive locations like hospitals, religious places, ponds/lakes or other water bodies.
- (vi) The local governing body and community shall be consulted while selecting the site.

D. Operation and Maintenance Impacts

- 86. Operation and Maintenance of the sewerage system will be carried out by Bhilwara Nagar Parishad (BNP) directly or through an external operator. The system have a design life of 30 years, during which shall not require major repairs or refurbishments and should operate with little maintenance beyond routine actions required to keep the equipment in working order. The stability and integrity of the system will be monitored periodically to detect any problems and allow remedial action if required. Any repairs will be small-scale involving manual, temporary, and short-term works involving regular checking and recording of performance for signs of deterioration, servicing and replacement of parts.
- 87. Repair works could cause some temporary disruption of activities at locations of social and cultural importance such as schools, hospitals, churches, tourist sites etc., so the same precautions as employed during the construction period should be adopted. ULB needs to:
 - (i) Identify any buildings at risk from vibration damage and avoiding any use of pneumatic drills or heavy vehicles in the vicinity;
 - (ii) Complete work in these areas quickly;
 - (iii) Consult the custodians of important buildings, cultural and tourism authorities and local communities in advance of the work to identify and address key issues, and avoid working at sensitive times, such as religious and cultural festivals.
- 88. There are also certain environmental risks from the operation of the sewer system, most notably from leaking sewer pipes as untreated faecal material can damage human health and contaminate both soil and groundwater. It will be imperative therefore that the operating agency establishes a procedure to routinely check the operation and integrity of the sewers, and to implement rapid and effective repairs where necessary. There is an occupation health risk to workers engaged in sewer maintenance activities. Following measures should be followed:
 - (i) Establish regular maintenance program, including:
 - Regular cleaning of grit chambers and sewer lines to remove grease, grit, and other debris that may lead to sewer backups. Cleaning should be conducted more frequently for problem areas.
 - Inspection of the condition of sanitary sewer structures and identifying areas
 that need repair or maintenance. Items to note may include
 cracked/deteriorating pipes; leaking joints or seals at manhole; frequent line
 blockages; lines that generally flow at or near capacity; and suspected
 infiltration or exfiltration; and
 - Monitoring of sewer flow to identify potential inflows and outflows
 - Conduct repairs on priority based on the nature and severity of the problem.
 Immediate clearing of blockage or repair is warranted where an overflow is

- currently occurring or for urgent problems that may cause an imminent overflow (e.g. pump station failures, sewer line ruptures, or sewer line blockages);
- (ii) Review previous sewer maintenance records to help identify "hot spots" or areas with frequent maintenance problems and locations of potential system failure, and conduct preventative maintenance, rehabilitation, or replacement of lines as needed:
- (iii) When a spill, leak, and/or overflow occurs, keep sewage from entering the storm drain system by covering or blocking storm drain inlets or by containing and diverting the sewage away from open channels and other storm drain facilities (using sandbags, inflatable dams, etc.). Remove the sewage using vacuum equipment or use other measures to divert it back to the sanitary sewer system.
- (iv) Prohibit/prevent disposal of wastewater/effluent from industrial units in the sewers; ensure regular checking to ensure no illegal entry of industrial wastewater into sewers
- (v) Develop an Emergency Response System for the sewerage system leaks, burst and overflows, etc.
- (vi) Provide necessary health & safety training to the staff in sewer cleaning & maintenance
- (vii) Provide all necessary personnel protection equipment
- (viii) For personnel cleaning underground sewers there is a risk due to oxygen deficiency and harmful gaseous emissions (hydrogen sulphide, carbon monoxide, methane, etc.); provide for adequate equipment (including oxygen masks) for emergency use
- 89. The citizens of the Bhilwara will be the major beneficiaries of the improved sewerage system, as the human waste from the homes will be removed rapidly, which otherwise would flow in open drains. In addition to improved environmental conditions, the project will improve the over-all health condition of the town as diseases of poor sanitation will be reduced. This should improve the environment, should deliver major improvements in individual and community health and well-being. Diseases of poor sanitation, such as diarrhea and dysentery, should be reduced, so people should spend less on healthcare and lose fewer working days due to illness, so their economic status should also improve, as well as their overall health.

V. PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

A. Overview

- 90. The active participation of stakeholders including local community, NGOs/CBOs, and the media in all stages of project preparation and implementation is essential for successful implementation and as well as operation of the project. It will ensure that the subprojects are designed, constructed, and operated with utmost consideration to local needs, ensures community acceptance, and will bring maximum benefits to the people. Public consultation and information disclosure is a must as per the ADB policy.
- 91. A three tier consultation process has been adopted for RUSDP: focus group discussions, primary household sample surveys and a town-level public consultation workshop. Most of the main stakeholders have already been identified and consulted during preparation of this IEE, and any others that are identified during project implementation will be brought into the process in the future. Primary stakeholders of the subproject are: residents, shopkeepers and

businesspeople who live and work alongside the roads in which network improvements will be provided, and government and utility agencies responsible for provision of services, Bhilwara Nagar Parishad, Public Health Engineering Department, and Rajasthan Pollution Control Board. Secondary stakeholder are: NGOs and CBOs working in the area, community representatives, beneficiary community in general, government agencies, the executing and implementing agencies (LSGD and RUIDP), Government of India and the ADB.

B. Public Consultation

92. The public consultation and disclosure program is a continuous process throughout the project implementation, including project planning, design and construction. Socio economic surveys were conducted in June-August, 2013. Women groups were consulted in April and May, 2014. Information consultation at sites were conducted in April and May in Bhilwara (Appendix 11).

1. Consultation during Project Preparation

- 93. Institutional consultations were conducted with the Governmental Departments such as Local Self Government Department, Public Works Department, Pollution Control Board, Public Health Engineering Department, Bhilwara Nagar Parishad, etc. The project proposals are formulated in consultation with PHED and Bhilwara Nagar Parishad and the proposals will be finalized only after certification of Commissioner Bhilwara NP that the proposals suit the requirements of the ULB.
- 94. Focus-group discussions with affected persons and other stakeholders were conducted to learn their views and concerns. A socio economic household survey has been conducted in the town, covering sample households, to understand the household characteristics, health status, and the infrastructure service levels, and also the demand for infrastructure services. General public and the people residing along the project activity areas were also consulted during visits to the project sites.
- 95. It was observed that people are willing to extend their cooperation as the proposed activities are proposed to enhance the infrastructure service levels and the living standard of the public. The public expressed their concern regarding the nuisance and disturbance (dust, road closure and traffic management activities) during the construction stage which can have impact on their day to day activities. Public demanded for advance notice before construction and proper warning signs along the construction area to avoid accidents and inconvenience. Public opined that an appropriate operation and maintenance system should be in place, especially for sewerage system, for its best functioning and to have the maximum health and aesthetic benefits.
- 96. A town-level stakeholder consultation meeting will be conducted in Bhilwara City during the detailed design stage to which representatives of primary and secondary stakeholders will be invited. The feedback and concerns of the stakeholders will be taken into consideration.

2. Consultation during construction

97. Prior to start of construction, BNP and PIU with the assistance of PMDSC and CAPC will conduct information dissemination sessions at major intersections and solicit the help of the local community leaders/prominent citizens to encourage the participation of the people to discuss various environmental issues. At each ward/neighborhood level, focus group meetings

will be conducted to discuss and plan construction work with local communities to reduce disturbance and other impacts, and provide a mechanism through which stakeholders can participate in project monitoring and evaluation.

98. A constant communication will be established with the affected communities to redress the environmental issues likely to surface during construction and operational phases and also regarding the grievance redress mechanism. BNP/PIU with the help of Community Awareness and Participation Consultant (CAPC) will organize public meetings and will appraise the communities about the progress on the implementation of EMP. Meeting will also be organized at the potential hotspots/sensitive locations before and during the construction.

C. Information Disclosure

- 99. Executive summary of the IEE will be translated in the local language and made available at the offices of BNP, RUIDP PMU and PIU. Copies of summary will be provided to participants of city level workshop to be organized in Bhilwara. Hard copies of the IEE will be accessible to citizens as a means to disclose the document and at the same time creating wider public awareness. Electronic version of the IEE in English and Executive Summary in Hindi will be placed in the official website of the BNP/RUIDP after approval of the IEE by Government and ADB. Stakeholders will also be made aware of grievance register and redress mechanism.
- 100. Public information campaigns via newspaper/radio/TV, to explain the project details to a wider population will be conducted. Public disclosure meetings will be conducted at key project stages to inform the public of progress and future plans. Prior to start of construction, the PIU will issue Notification on the start date of implementation in local newspapers A board showing the details of the project will be displayed at the construction site for the information of general public.
- 101. Local communities will be continuously consulted regarding location of construction camps, access and hauling routes and other likely disturbances during construction. The road closure together with the proposed detours will be communicated via advertising, pamphlets, radio broadcasts, road signage, etc.

VI. GRIEVANCE REDRESS MECHANISM

A. Project Specific Grievance Redress Mechanism

- 102. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate, and facilitate the resolution of AP's concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to record and resolve social and environmental concerns linked to the project.
- 103. **Common GRM**. A common GRM will be in place for social, environmental, or any other grievances related to the project; the resettlement plans (RPs) and IEEs will follow the GRM described below. The GRM will provide an accessible and trusted platform for receiving and facilitating resolution of affected persons' grievances related to the project. The multi-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required.

- 104. ULB-wide public awareness campaigns will ensure that awareness on grievance redress procedures is generated through the campaign. PIU Assistant Safeguards Officer (ASO) through Community Awareness and Public Participation NGO (CAPP-NGO) will conduct ULB-wide awareness campaigns to ensure that poor and vulnerable households are made aware of grievance redress procedures and entitlements.
- 105. APs will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes will be installed by project ULBs or by e-mail, by post, or by writing in a complaints register in ULB/PIU offices. **Appendix 11** has the sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. The PMU Project Officers (Environment & Social) will have the overall responsibility for timely grievance redressal respectively on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party through the PIU ASO.

B. Grievance Redress Process

106. In case of grievances that are immediate and urgent in the perception of the complainant, the contractor, and supervision personnel from PIU and PMDSC on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned PIU Assistant Safeguards Officer, contractors, will be posted at all construction sites at visible locations.

- (i) **1st level grievance**. The contractors, PIU supervision personnel, PIU Assistant Safeguards Officer and implementing NGO/CAPC⁶ can immediately resolve issues on-site in consultation with each other, and will be required to do so within 3 days of receipt of a complaint/grievance.
- (ii) 2nd level grievance. All grievances that cannot be redressed within 3 days at field/ward level will be brought to the notice of respective Project Officers (Environment/Social) of PMU. PMU POs will resolve the grievance within 7 days of receipt of compliance/grievance in discussion with the PIU, CAPC and the Contractor. PMDSC will assist POs in resolving the issue.
- (iii) **3rd level grievance**. All the grievances that are not addressed by PMU within in 7 days of receipt will be brought to the notice of notice of the Grievance Redressal Committee (GRC). The City Level Committee (CLC) that will be established in every project town will act as GRC⁷. GRC will meet twice a month and determine the merit of each grievance brought to the committee. The PIU ASO will be responsible to see through the process of redressal of each

Community Awareness and Public Participation (CAPC) will oversee the matters if there is no Resettlement Plan (RP) Implementing NGO

City Level Committees (CLC) will be formed at town-level with members composed of: District Collector (DC) as Chairperson, and following as members: ULB Commissioner; Assistant Safeguards Officer PIU; representative from RPCB regional office; and one representative each from relevant government departments as appropriate (PWD / PHED / DAM etc). All town-level GRCs will have at least one woman member/chairperson. In addition, for project-related grievances, representatives of APs, community-based organizations (CBOs), and eminent citizens will be invited as observers in GRC meetings

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- grievance. The GRC will resolve the grievance within 15 days of receiving the complaint.
- (iv) 4th level grievance. Very major issues that are beyond the jurisdictional authority of the CLC or those that have the potential to cause social conflicts or environmental damage or those that remain unresolved at PMU/CLC level, will be referred to the Empowered Committee (EC).8 All decisions taken by the GRC and PSC will be communicated to the APs by the PIU ASO.
- The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage, and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM. Alternatively, if the grievance is related to land acquisition, resettlement & rehabilitation, the APs can approach the Land Acquisition, Rehabilitation and Resettlement Authority (LARRA). As per the latest Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation, and Resettlement Act, 2013, the state government will have to establish the LARRA to address grievances in implementation of LARRA.
- In the event that the established GRM is not in a position to resolve the issue, the 108. affected person also can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB India Resident Mission (INRM). The complaint can be submitted in any of the official languages of ADB's DMCs. The ADB Accountability Mechanism information will be included in the PID to be distributed to the affected communities, as part of the project GRM.

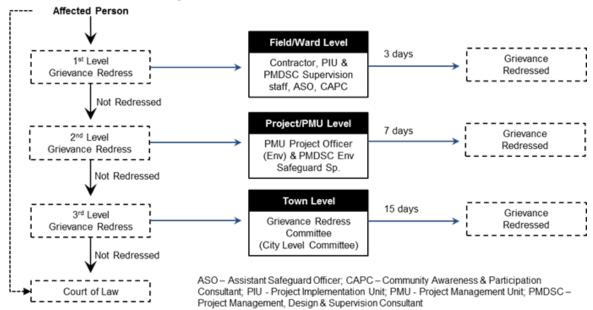


Figure 3: Grievance Redressal Process

The Empowered Committee (EC) will be chaired by the Minister of Urban Development and Housing, and members will include Ministers, Directors and/or representatives of other relevant Government Ministries and Departments

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Environmental Management Plan

- 109. The following tables show the potential environmental impacts, proposed mitigation measures and responsible agencies for implementation and monitoring.
- 110. The purpose of the environmental management plan (EMP) is to ensure that the activities are undertaken in a responsible, non-detrimental manner with the objectives of: (i) providing a proactive, feasible, and practical working tool to enable the measurement and monitoring of environmental performance on-site; (ii) guiding and controlling the implementation of findings and recommendations of the environmental assessment conducted for the project; (iii) detailing specific actions deemed necessary to assist in mitigating the environmental impact of the project; and (iv) ensuring that safety recommendations are complied with.
- 111. A copy of the EMP must be kept at work sites at all times. This EMP will be included in the bid documents and will be further reviewed and updated during implementation. The EMP will be made binding on all contractors operating on the site and will be included in the contractual clauses. Non-compliance with, or any deviation from, the conditions set out in this document constitutes a failure in compliance.
- 112. For civil works, the contractor will be required to (i) establish an operational system for managing environmental impacts (ii) carry out all of the monitoring and mitigation measures set forth in the EMP; and (iii) implement any corrective or preventative actions set out in safeguards monitoring reports that the employer will prepare from time to time to monitor implementation of this IEE and EMP. The contractor shall allocate budget for compliance with these EMP measures, requirements and actions.

Table 4: Design Stage Environmental Management Plan

Field	Anticipated Impact	Mitigation Measures	Responsible for Implementation/ Monitoring	Cost and Source of Funds
Change in raw sewage quality	Mixing of industrial effluent with sewage	(i) No industrial wastewater shall be allowed to dispose into municipal sewers (ii) No domestic wastewater from industrial units shall be allowed into municipal sewers (iii) Ensure that there is no illegal discharge through manholes or inspection chambers (iv) Conduct public awareness programs; in coordination with RPCB, issue notice to all industries for compliance	PIU / PMU	Project Costs

Table 5: Environmental Management Plan of Anticipated Impacts during Pre-Construction

Field	Anticipated Impact	Mitigation Measures	Responsible for	Monitoring of	Cost and Source of
			Implementation	Mitigation	Funds
Compliance with	Environmental	Compliance with	PIU and Bhilwara	PMU	No costs required
environmental	impacts due to	environmental	Nagar Parishad		
subproject selection	subproject	subproject selection			
criteria		criteria			
		A compliance checklist			
		is appended to this			
		report (Appendix 8)			
Utilities	Telephone lines,	(i) Identify and include	Contractor in	(i) List of affected	No cost required.
	electric poles and	locations and operators	collaboration with PIU	utilities and	·
	wires, water lines	of these utilities in the	and with approval of	operators;	Mitigation measures
	within proposed	detailed design	PMU	·	are part of TOR of
	project area	documents to prevent		(ii) Bid document to	PMÜ, PIU and
	, ,	unnecessary disruption		include requirement	PMDSC
		of services during		for a contingency	
		construction phase; and		plan for service	
		(ii) Require construction		interruptions	
		contractors to prepare a		(example provision of	
		contingency plan to		water if disruption is	
		include actions to be		more than 24 hours),	
		taken in case of		spoil management	
		unintentional		plan (Appendix 8),	

Field	Anticipated Impact	Mitigation Measures	Responsible for Implementation	Monitoring of Mitigation	Cost and Source of Funds
		interruption of services. (iii) Require contractors to prepare spoils management plan (Appendix 8) and traffic management plan (Appendix 9)		and traffic management plan (Appendix 9)	
Social and Cultural Resources	Ground disturbance can uncover and damage archaeological and historical remains	(i) Consult Dept. of Archeology and museums, Government of Rajasthan to obtain an expert assessment of the archaeological potential of the site; (ii) Consider alternatives if the site is found to be of medium or high risk; (iii) Develop a protocol for use by the construction contractors in conducting any excavation work, to ensure that any chance finds are recognized and measures are taken to ensure they are protected and conserved.	PIU	Chance Finds Protocol	No cost required. Mitigation measures are part of TOR of PIU and PMDSC
Construction work camps, hot mix plants, stockpile areas, storage areas, and disposal areas.	Disruption to traffic flow and sensitive receptors	(i) Prioritize areas within or nearest possible vacant space in the project location; (ii) If it is deemed necessary to locate elsewhere, consider sites that will not promote instability and	Contractor to finalize locations in consultation and approval of PIU	(i) List of selected sites for construction work camps, hot mix plants, stockpile areas, storage areas, and disposal areas. (ii) Written consent of landowner/s (not lessee/s) for reuse of	No cost required. Mitigation measures are part of TOR of PIU and PMDSC and also part of contractual terms

Field	Anticipated Impact	Mitigation Measures	Responsible for Implementation	Monitoring of Mitigation	Cost and Source of Funds
		result in destruction of	•	excess spoils to	
		property, vegetation,		agricultural land	
		irrigation, and drinking			
		water supply systems;			
		(iii) Do not consider			
		residential areas;			
		(iv) Take extreme care			
		in selecting sites to			
		avoid direct disposal to			
		water body which will			
		inconvenience the			
		community.			
		(v) For excess spoil			
		disposal, ensure (a) site			
		shall be selected			
		preferably from barren,			
		infertile lands. In case			
		agricultural land needs			
		to be selected, written			
		consent from			
		landowners (not			
		lessees) will be			
		obtained; (b) debris			
		disposal site shall be at			
		least 200 m away from			
		surface water bodies;			
		(c) no residential areas			
		shall be located within			
		50 m downwind side of			
		the site; and (d) site is			
		minimum 250 m away			
		from sensitive locations			
		like settlements,			
		ponds/lakes or other			
		water bodies.			
Sources of Materials	Extraction of materials	(i) Prioritize sites	Contractor to prepare	(i) List of approved	No cost required.
	can disrupt natural	already permitted by	list of approved quarry	quarry sites and	
	land contours and	the Department of	sites and sources of	sources of materials;	Mitigation measures

Field	Anticipated Impact	Mitigation Measures	Responsible for Implementation	Monitoring of Mitigation	Cost and Source of Funds
	vegetation resulting in accelerated erosion, disturbance in natural drainage patterns, ponding and water logging, and water pollution.	Mines and Geology (ii) If other sites are necessary, inform construction contractor that it is their responsibility to verify the suitability of all material sources and to obtain the approval of PMU and (iii) If additional quarries will be required after construction is started, inform construction contractor to obtain a written approval from PIU.	materials with the approval of PIU	(ii) Bid document to include requirement for verification of suitability of sources and permit for additional quarry sites if necessary.	are part of TOR of PIU and PMDSC and also part of contractual terms
Consents, permits, clearances, NOCs, etc.	Failure to obtain necessary consents, permits, NOCs, etc. can result to design revisions and/or stoppage of works	(i) Obtain all necessary consents, permits, clearance, NOCs, etc. prior to award of civil works. (ii) Ensure that all necessary approvals for construction to be obtained by contractor are in place before start of construction (iii) Acknowledge in writing and provide report on compliance all obtained consents, permits, clearance, NOCs, etc. (iv) Include in detailed design drawings and documents all conditions and	PIU and PMDSC	Incorporated in final design and communicated to contractors.	No cost required. Cost of obtaining all consents, permits, clearance, NOCs, etc. prior to start of civil works responsibility of PIU. Mitigation measures are part of TOR of PIU and PMDSC

Field	Anticipated Impact	Mitigation Measures	Responsible for Implementation	Monitoring of Mitigation	Cost and Source of Funds
		provisions if necessary			

Table 6: Environmental Management Plan of Anticipated Impacts during Construction

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
EMP Implementation Training	Irreversible impact to the environment, workers, and community	(i) Project manager and all key workers will be required to undergo EMP implementation including spoils management, Standard operating procedures (SOP) for construction works; occupational health and safety (OH&S), core labor laws, applicable environmental laws, etc.	Construction Contractor	(i) Certificate of Completion (Safeguards Compliance Orientation) (ii) Posting of Certification of Completion at worksites (iii) Posting of EMP at worksites	Cost of EMP Implementation Orientation Training to contractor is responsibility of PMU. Other costs responsibility of contractor.
Air Quality	Emissions from construction vehicles, equipment, and machinery used for installation of pipelines resulting to dusts and increase in concentration of vehicle-related pollutants such as carbon monoxide, sulfur oxides, particulate matter, nitrous oxides, and hydrocarbons.	(i) Consult with PIU on the designated areas for stockpiling of clay, soils, gravel, and other construction materials; (iii) Damp down exposed soil and any stockpiled material on site by water sprinkling necessary during dry weather; (iv) Use tarpaulins to cover sand and other loose material when transported by trucks; and (v) Fit all heavy equipment and machinery with air pollution control devices which are operating correctly.	Construction Contractor	(i) Location of stockpiles; (ii) Complaints from sensitive receptors; (iii) Heavy equipment and machinery with air pollution control devices; (iv) Certification that vehicles are compliant with Air Act	Cost for implementation of mitigation measures responsibility of contractor.
Surface water quality	Mobilization of settled silt materials, and chemical contamination from fuels and lubricants	(i) Prepare and implement a spoils management plan (Appendix 4) (ii) Avoid stockpiling of earth fill especially during the monsoon	Construction Contractor	(i) Areas for stockpiles, storage of fuels and lubricants and waste materials; (ii) Number of silt	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
	during installation of pipelines can contaminate nearby surface water quality.	season unless covered by tarpaulins or plastic sheets; (ii) Install temporary silt traps or sedimentation basins along the drainage leading to the water bodies; (iii) Place storage areas for fuels and lubricants away from any drainage leading to water bodies; (iv) Dispose any wastes generated by work in designated sites; and (v) Conduct surface quality inspection according to the Environmental Management Plan (EMP).		traps installed along trenches leading to water bodies; (iii) Records of surface water quality inspection; (iv) Effectiveness of water management measures; (v) No visible degradation to nearby drainages, nallahs or water bodies due to civil works	
Noise Levels	Increase in noise level due to earthmoving and excavation equipment, and the transportation of equipment, materials, and people	(i) Plan activities in consultation with PIU/PMDSC so that activities with the greatest potential to generate noise are conducted during periods of the day which will result in least disturbance; (ii) Horns should not be used unless it is necessary to warn other road users or animals of the vehicle's approach; (iii) Minimize noise from construction equipment by using vehicle silencers, fitting jackhammers with noise-reducing mufflers, and portable street barriers the sound impact to surrounding sensitive receptor; and (iv) Maintain maximum sound levels not exceeding 80 decibels (dbA) when measured at a	Construction Contractor	(i) Complaints from sensitive receptors; (ii) Use of silencers in noise-producing equipment and sound barriers; (iii) Equivalent day and night time noise levels (see Appendix 3 of this IEE)	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		distance of 10 m or more from the vehicle/s.			
Landscape and aesthetics	Impacts due to excess excavated earth, excess construction materials, and solid waste such as removed concrete, wood, packaging materials, empty containers, spoils, oils, lubricants, and other similar items.	(i) Prepare and implement spoils management plan (Appendix 8); (ii) Avoid stockpiling of excess excavated soils; (iii) Coordinate with ULB/PIU for beneficial uses of excess excavated soils or immediately dispose to designated areas; (iv) Recover used oil and lubricants and reuse or remove from the sites; (v) Manage solid waste according to the following preference hierarchy: reuse, recycling and disposal to designated areas; (vi) Remove all wreckage, rubbish, or temporary structures which are no longer required; and (vii) Request PIU to report in writing that the necessary environmental restoration work has been adequately performed before acceptance of work.	Construction Contractor	(i) Complaints from sensitive receptors; (ii) Worksite clear of hazardous wastes such as oil/fuel (iiv) Worksite clear of any excess excavated earth, excess construction materials, and solid waste such as removed concrete, wood, packaging materials, empty containers	Cost for implementation of mitigation measures responsibility of contractor.
Existing Infrastructure and Facilities	Disruption of service and damage to existing infrastructure at specified project location	(i) Obtain from PIU the list of affected utilities and operators if any; (ii) Prepare a contingency plan to include actions to be done in case of unintentional interruption of service	Construction Contractor	Existing Utilities Contingency Plan	Cost for implementation of mitigation measures responsibility of contractor.
Ecological Resources – Terrestrial	Loss of vegetation and tree cover	(i) Minimize removal of vegetation and disallow cutting of trees; (ii) If tree-removal will be required, obtain tree-cutting permit from the Revenue	Construction Contractor	PIU to report in writing the no of trees cut and planted.	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		Department; and (iii) Plant two native trees for every one that is removed.			
Land use	Environmental Issues due to land use change	The impact due to change in land use will be negligible due to this project.	Not applicable	Not applicable	Not applicable
Accessibility	Traffic problems and conflicts near project locations and haul road	(i) Plan transportation routes so	Construction Contractor	(i) Traffic route during construction works including number of permanent signages, barricades and flagmen on worksite (Appendix 9); (ii) Complaints from sensitive receptors; (iii) Number of signages placed at project location.	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		access in all the locations until normalcy is restored.			
Socio-Economic – Income.	Impede the access of residents and customers to nearby shops	(i) Prepare and implement spoils management plan (Appendix 8) (ii) Leave spaces for access between mounds of soil; (ii) Provide walkways and metal sheets where required for people; (iii) Increase workforce in front of critical areas such as institutions, place of worship, business establishment, hospitals, and schools; (iv) Consult businesses and institutions regarding operating hours and factoring this in work schedules; and (v) Provide sign boards for pedestrians to inform nature and duration of construction works and contact numbers for concerns/complaints.	Construction	(i) Complaints from sensitive receptors; (ii) Spoils management plan (iii) Number of walkways, signages, and metal sheets placed at project location.	Cost for implementation of mitigation measures responsibility of contractor.
Socio-Economic - Employment	Generation of temporary employment and increase in local revenue	(i) Employ at least 50% of the labour force, or to the maximum extent, local persons within the 2-km immediate area if manpower is available; (ii) Secure construction materials from local market. (iii) Comply with labor laws	Construction Contractor	(i) Employment records; (ii) Records of sources of materials (iii) Compliance to labor laws (see Appendix 7 of this IEE)	Cost for implementation of mitigation measures responsibility of contractor.
Occupational Health and Safety	Occupational hazards which can arise during work	(i) Comply with all national, state and local core labor laws (see Appendix 7 of this IEE) (ii) Develop and implement site-specific occupational health and safety (OH&S) Plan which will include measures such as: (a)	Construction Contractor	(i) Site-specific OH&S Plan; (ii) Equipped first-aid stations; (iii) Medical insurance coverage for workers; (iv) Number of	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		excluding public from the site; (b) ensuring all workers are provided with and use personal protective equipment like helmet, gumboot, safety belt, gloves, nose musk		accidents; (v) Supplies of potable drinking water; (vi) Clean eating areas where workers are not	
		and ear plugs; (c) OH&S Training for all site personnel; (d) documented procedures to be followed for all site activities; and (e) documentation of work-related		exposed to hazardous or noxious substances; (vii) record of H&S orientation trainings (viii) personal	
		accidents; (ii) Ensure that qualified first-aid can be provided at all times. Equipped first-aid stations shall		protective equipment; (ix) % of moving equipment outfitted with audible back-up	
		be easily accessible throughout the site; (iii) Provide medical insurance coverage for workers; (iv) Secure all installations from		alarms; (xi) permanent sign boards for hazardous areas such as energized electrical	
		unauthorized intrusion and accident risks; (v) The project area experiences extreme temperature during		devices and lines, service rooms housing high voltage equipment, and areas	
		summer months of April and May, which may affect the health of workers engaged in construction work. Contractor should take		for storage and disposal. (xii) Compliance to core labor laws (see	
		necessary measures during summers including the following: (a) work schedule should be adjusted to avoid peak		Appendix 7 of this IEE)	
		temperature hours (12 – 3 PM); (b) provide appropriate shade near the work place; allow periodic resting and provide			
		adequate water, and (c) provide necessary medicine and facilities			

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		to take care of dehydration			
		related health issues			
		(v) Provide supplies of potable			
		drinking water;			
		(vi) Provide clean eating areas			
		where workers are not exposed			
		to hazardous or noxious			
		substances;			
		(vii) Provide H&S orientation			
		training to all new workers to			
		ensure that they are apprised of			
		the basic site rules of work at the			
		site, personal protective			
		protection, and preventing			
		injuring to fellow workers;			
		(viii) Provide visitor orientation if			
		visitors to the site can gain			
		access to areas where hazardous			
		conditions or substances may be			
		present. Ensure also that visitor/s			
		do not enter hazard areas			
		unescorted;			
		(ix) Ensure the visibility of			
		workers through their use of high			
		visibility vests when working in or			
		walking through heavy equipment			
		operating areas;			
		(x) Ensure moving equipment is			
		outfitted with audible back-up			
		alarms;			
		(xi) Mark and provide sign boards			
		for hazardous areas such as			
		energized electrical devices and			
		lines, service rooms housing high			
		voltage equipment, and areas for			
		storage and disposal. Signage			

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		shall be in accordance with international standards and be well known to, and easily understood by workers, visitors, and the general public as appropriate; and (xii) Disallow worker exposure to noise level greater than 85 dBA for a duration of more than 8 hours per day without hearing protection. The use of hearing protection shall be enforced actively. (xiii) Provide porper solid and liquid waste management program in workers' campsite, separate from spoils and debris disposal, as their presence can add to existing waste volume at the project sites.			
Community Health and Safety.	Traffic accidents and vehicle collision with pedestrians during material and waste transportation	(i) Plan routes to avoid times of peak-pedestrian activities. (ii) Liaise with PIU/ULB in identifying high-risk areas on route cards/maps. (iii) Maintain regularly the vehicles and use of manufacturer-approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure. (iv) Provide road signs and flag persons to warn of on-going trenching activities.	Construction Contractor	(i) Traffic Management Plan; (ii) Complaints from sensitive receptors	Cost for implementation of mitigation measures responsibility of contractor.
Safety of sensitive groups (children, elders etc.) and	Trench excavation in in narrow streets will pose high risk to	(i) Provide prior information to the local people about the nature and duration of work	Construction Contractor	Complaints from neighborhood and monitoring of	Cost for implementation of mitigation measures

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
others pedestrians in narrow streets	children and elders in the locality	(ii) Conduct awareness program on safety during the construction work (iii) Undertake the construction work stretch-wise; excavation, pipe laying and trench refilling should be completed on the same day (iv) Provide barricades, and deploy security personnel to ensure safe movement of people and also to prevent unnecessary entry and to avoid accidental fall into open trenches		accidents	responsibility of contractor.
Work Camps and worksites	Temporary air and noise pollution from machine operation, water pollution from storage and use of fuels, oils, solvents, and lubricants Unsanitary and poor living conditions for workers	(i) Consult with PIU before locating project offices, sheds, and construction plants; (ii) Minimize removal of vegetation and disallow cutting of trees; (iii) Provide drinking water, water for other uses, and sanitation facilities for employees; (iv) Ensure conditions of livability at work camps are maintained at the highest standards possible at all times; (v) Train employees in the storage and handling of materials which can potentially cause soil contamination; (vi) Recover used oil and lubricants and reuse or remove from the site; (vii) Manage solid waste according to the preference hierarchy: reuse, recycling and	Construction	(i) Complaints from sensitive receptors; (ii) Drinking water and sanitation facilities for employees	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		disposal to designated areas; (viii) Ensure unauthorized persons specially children are not allowed in any worksite at any given time.			
Social and Cultural Resources	Risk of archaeological chance finds	(i) Strictly follow the protocol for chance finds in any excavation work; (ii) Request PIU or any authorized person with archaeological field training to observe excavation; (iii) Stop work immediately to allow further investigation if any finds are suspected; (iv) Inform PIU if a find is suspected, and take any action they require ensuring its removal or protection in situ.	Construction Contractor	Records of chance finds	Cost for implementation of mitigation measures responsibility of contractor.
Submission of EMP implementation report	Unsatisfactory compliance to EMP	(i) Appointment of supervisor to ensure EMP implementation (ii) Timely submission of monitoring reports including pictures	Construction contractor	Availability and competency of appointed supervisor Monthly report	Cost for implementation of mitigation measures responsibility of contractor.
Post-construction clean-up	Damage due to debris, spoils, excess construction materials	(i) Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; and (ii) All excavated roads shall be reinstated to original condition. (iii) All disrupted utilities restored (iv) All affected structures rehabilitated/compensated (v) The area that previously housed the construction camp is to be checked for spills of	Construction Contractor	PIU/PMDSC report in writing that (i) worksite is restored to original conditions; (ii) camp has been vacated and restored to pre-project conditions; (iii) all construction related structures not relevant to O&M are removed; and (iv) worksite clean-up is satisfactory.	Cost for implementation of mitigation measures responsibility of contractor.

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
		substances such as oil, paint, etc. and these shall be cleaned up. (vi) All hardened surfaces within the construction camp area shall be ripped, all imported materials removed, and the area shall be top soiled and regrassed using the guidelines set out in the revegetation specification that			
		forms part of this document. (vii) The contractor must arrange the cancellation of all temporary services. (viii) Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before acceptance of work.			

Table 7: Environmental Management Plan of Anticipated Impacts during Operation

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
Construction disturbances, nuisances, public & worker safety,	All work sites	Implementation of dust control, noise control, traffic management, & safety measures. Site inspection checklist to review implementation is appended at Appendix 12	Weekly during construction	Supervising staff and safeguards specialists	No costs required
Check the leakages blockages, overflow problem in sewers	It may affect the sewer system, contaminate land, water and create public health issues	Effective operation to avoid and/or immediate clearance of such leaks, blockages Implementation of regular O&M schedules	Bhilwara Nagar Parishad/Oper ator	Bhilwara Nagar Parishad	JNP Cost
Check the leakages blockages,	Occupational health & safety: for personnel cleaning underground sewers there is a	(i) Provide necessary health & safety training to the staff engaged sewer cleaning & maintenance	Bhilwara Nagar Parishad/Oper	Bhilwara Nagar Parishad	JNP Cost

Field	Anticipated Impact	Mitigation Measures	Responsible for Mitigation	Monitoring of Mitigation	Cost and Source of Funds
overflow problem in sewers	risk due to oxygen deficiency and harmful gaseous emissions (hydrogen sulphide, carbon monoxide, methane, etc.);	(ii) provide appropriate personal protection equipment (including oxygen masks)	ator		

Table 8: Environmental Monitoring Plan of Anticipated Impacts during Construction

Monitoring field	Monitoring location	Monitoring parameters	Frequency	Responsibility	Cost & Source of Funds
Construction disturbances, nuisances, public & worker safety,	All work sites	Implementation of dust control, noise control, traffic management, & safety measures. Site inspection checklist to review implementation is appended at Appendix 12	Weekly during construction	Supervising staff and safeguards specialists	No costs required
Ambient air quality	3 locations (STP site, and centre of the town, and at construction)	• PM10, PM2.5, NO2, SO2, CO	Once before start of construction Quarterly (yearly 4- times) during construction	Contractor	Cost for implementation of monitoring measures responsibility of contractor (51 samples x 4000 per sample = 204,000)
Ambient noise	3 locations (STP site, and centre of the town, and at construction)	Day time and night time noise levels	Once before start of construction Quarterly (yearly 4- times) during construction	Contractor	Cost for implementation of monitoring measures responsibility of contractor (51 samples x 1500 per sample = 76,500)

Table 9: Environmental Monitoring Plan of Anticipated Impacts during Operation

Monitoring field	Monitoring location	Monitoring parameters	Frequency	Responsibility	Cost & Source of Funds
Monitoring of raw wastewater quality	Inlet of the STP	Suspended solids, pH, Temperature Oil and grease, Total residual chlorine, Ammonical nitrogen (as N), BOD, COD, Nitrate Nitrogen The values should be within the limit specified by CPCB to discharge into municipal sewers (see Appendix 4)	Monthly once	BNP	BNP Cost
Sewer network to sustain operational efficiency and avoid clogging	Sewer network	to be included in the O&M plan prepared under the project	as per O&M plan	BNP	BNP

Monitoring field	Monitoring location	Monitoring parameters	Frequency	Responsibility	Cost & Source of Funds
and early occurrence of leakages					

B. Institutional Requirements

- Government. The Local Self Government Department (LSGD) of Government of 113. Rajasthan will be the Executing Agency (EA) and existing RUIDP will be the Implementing Agency (IA). The LSGD will be responsible for overall strategic planning, guidance and management of the RUSDP, and for ensuring compliance with tranche release conditions and loan covenants. A policy support unit will be established in the LSGD to support the government for implementation of the tranche release policy actions under the program loan. The RUIDP will be responsible for planning, implementation, monitoring and supervision, and coordination of all activities under the RUSDP. The RUIDP will recruit two consulting firms - (i) project management, design and supervision consultant (PMDSC), and (ii) community awareness and participation consultant (CAPC) to provide support in implementation of RUSDP. Six Project Implementation Units (PIUs), one each of in six project towns, shall be set up directly to assist in implementation. PMU will support PIUs in implementation, management and monitoring of the project. PMU and PIUs will be assisted by PMDSC and CAPC. PIUs will appoint construction contractors to build infrastructure. Once the infrastructure is built and commissioned, the Urban Local Bodies will operate and maintain the infrastructure.
- 114. Project Officer (Environment) at PMU and Assistant Safeguard Officer (ASO) at each of the PIUs will be responsible for environment management and monitoring activities, and will be supported by Environment Safeguard Specialist of PMDSC Team and Community Mobilization of Community Awareness and Participation Consultant (CAPC).
- 115. At state-level an inter-ministerial Empowered Committee (EC) will be established to provide overall policy direction EC will provide approval for the projects and recommend to Government for providing administrative sanction for the sub-projects. City Level Committees (CLCs) will be established in each town to oversee the implementation at town level.
- 116. **Consultants**. PMU and PIUs will be assisted by Project Management, Design and Supervision Consultants (PMDSC) in project planning, preparation of project and cost estimates, coordination, technical guidance and supervision, financial control, training and overall project management. Consultant Team includes an environmental safeguards specialist (ESS), who will support PO (Environment) at PMU and ASOs at PIUs in implementation, management and monitoring of all safeguard related activities. The consultant team also includes an Assistant Construction Manager at each PIU responsible for the construction supervision including environmental safeguards at subproject town level. CAPC will support PIU in construction facilitation, community consultation and grievance registration and redressal during the construction.
- 117. **Contractor.** The contractor shall appoint an Environment, Health and Safety (EHS) supervisor who will be responsible on a day-to-day basis for (i) ensuring implementation of EMP, (ii) coordinating with the ACM and environment safeguards specialists (all levels PO, ASO & ESS); (iii) community liaison, consultations with interested/affected parties, and grievance

redressal; and (iv) reporting. Requirement of EHS Supervisor will be included in the bid documents.

118. The following figure and **Table 12** summarizes the institutional responsibility of environmental safeguards at all stages of the project.

Ministry of UD & Housing, GoR · Overall compliance with EARF & ADB ADB SPS 2009 Local Self Government Dept (EA) Compliance with covenants Compliance review & approvals · Compliance with Subproject Selection Criteria & EARF RUIDP (IA) · Subproject Categorization Consultancy Support Review & approve EIA/IEE & EMP PMU & submit to ADB for approval (PMDSC) · Ensure consultation & disclosure Project Officer (Environment) Environmental · Ensure regulatory compliance · Project Officer (Social) Safeguard Sp. Ensure EMP in contract Social Safeguard Sp. · Oversee EMP implementation Prepare semiannual EMR/SMR · Fill up REA checklist Conduct EIA/IEE studies Conduct consultation & disclosure PILI · Obtain approvals/permissions Prepare EMP & budget Assistant Safeguards Officer · Include EMP in contract · Monitoring EMP implementation Prepare monitoring reports Implement EMP Obtain permissions/clearances Contractor · Conduct environmental quality monitoring **EHS Supervisor** Implement corrective action plans if required · Prepare monthly reports

Figure 4: Environmental Safeguards Implementation Arrangement

ADB – Asian Development Bank; EARF – Environmental Assessment and Review Procedures; EHS – Environment, Health & Safety, EIA – Environmental Impact Assessment, EMP – Environmental Management Plan; GoR – Government of Rajasthan; IA – Implementing Agency; IEE – Initial Environmental Examination; PIU – Project Implementation Unit; PMU – Project Management Unit; PMDSC – Project Management, Design & Supervision Consultant; RUIDP – Rajasthan Urban Infrastructure Development Project; REA – Rapid Environmental Assessment; SPS – Safeguard Policy Statement, 2009,

Responsible Responsibility **Pre-Construction Stage** Agency **Construction Stage Post-Construction** Project Officer (i) Review REA checklists and (i) Over-all environmental Compliance (Environment), assign categorization based on safeguards compliance of the monitoring to review РМU **ADB SPS 2009** project the environmental (ii) Review and approve EIA/IEE (iii) Monitor and ensure performance of project (iii) Submit EIA/IEE to ADB for compliance of EMPs as well component, if required approval and disclosure in ADB as any other environmental and as specified in website provisions and conditions. **EMP** (iv) Ensure approved IEEs are (i) Review monthly monitoring disclosed in RUDIP websites and report summary posted in public areas (ii) Prepare and submit to ADB accessible and understandable by semi-annual monitoring reports local people. (v) Ensure environmental (iv) If necessary prepare management plans (EMPs) are Corrective Action Plan and included in the bid documents and ensure implementation of contracts corrective actions to ensure no

Table 10: Institutional Roles and Responsibilities

Responsible	Responsibility	Construction Stage	Post Construction
Agency	Pre-Construction Stage (vi) Organize an orientation workshop for PMU, PIU, ULB and all staff involved in the project implementation on (a) ADB SPS, (b) Government of India national, state, and local environmental laws and regulations, (c) core labor standards, (d) OH&S, (e) EMP implementation especially spoil management, working in congested areas, public relations and ongoing consultations, grievance redress, etc. (vii) Assist in addressing any grievances brought about through the Grievance Redress Mechanism in a timely manner as per the IEEs (viii) Organize an induction course for the training of contractors preparing them on EMP implementation, environmental monitoring requirements related to mitigation measures; and taking immediate actions to remedy unexpected adverse impacts or ineffective mitigation measures found during the course of implementation. (ix) Ensure compliance with all government rules and regulations regarding site and environmental clearances as well as any other environmental requirements (x) Assist PMU, PIUs, and project NGOs to document and develop good practice construction guidelines to assist the contractors in implementing the provisions of IEE. (xi) Assist in the review of the contractors' implementation plans to ensure compliance with the	environmental impacts; (iii) Review and submit Corrective Action Plans to ADB (iv) Organize capacity building programs on environmental safeguards (iv) Coordinate with national and state level government agencies (vi) Assist in addressing any grievances brought about through the Grievance Redress Mechanism in a timely manner as per the IEEs (ix) Coordinate PIUs, NGOs, consultants and contractors on mitigation measures involving the community and affected persons and ensure that environmental concerns and suggestions are incorporated and implemented	Post-Construction
Assistant Safeguard Officer, PIU & ULB	(i) Conduct initial environmental assessment for proposed project using REA checklists and submit to PMU (ii) Prepare EIA/IEE based on categorization and submit to PMU for approval (iii) Ensure IEE is included in bid documents and contract agreements. Ensure cost of EMP implementation is provided. (iv) Disclose approved EIAs/IEEs. (v) Obtain all necessary clearances, permits, consents, NOCs, etc. Ensure compliance to the provisions and conditions.	(i) Ensure EMP implementation is included in measuring works carried out by the contractors and certifying payments. (ii) Ensure Corrective Action Plan is implemented. (ii) Conduct public awareness campaigns and participation programs (iii) Prepare monthly reports. (vi) Address any grievances brought about through the Grievance Redress Mechanism in a timely manner as per the IEEs	(i) Conducting environmental monitoring, as specified in the EMP. (ii) Issuance of clearance for contractor's post- construction activities as specified in the EMP.

Responsible	Responsibility		
Agency	Pre-Construction Stage	Construction Stage	Post-Construction
	(vi) EMP implementation regarding sites for disposal of wastes, camps, storage areas, quarry sites, etc. (vii) Ensure contractors undergo EMP implementation orientation prior to start of civil works		
Consultant - PMDSC 1. Environmental Safeguard Specialist 2. Assistant Construction Manager at PIU	(i) Assist PIU in preparation of REA checklists and EIAs/IEEs (ii) Assist PIU in obtaining all necessary clearances, permits, consents, NOCs, etc. Ensure provisions and conditions are incorporated in the IEE and detailed design documents. (iii) Assist in ensuring IEE is included in bid documents and contract agreements. Assist in determining adequacy of cost for EMP implementation. (iv) Assist in addressing any concern related to IEE and EMP. (v) Assist in summarizing IEE and translating to language understood by local people.	(i) Monitor EMP implementation (ii) Recommend corrective action measures for non-compliance by contractors (iii) Assist in the review of monitoring reports submitted by contractors (iv) Assist in the preparation of monthly monitoring reports (vi) Assist in addressing any grievances brought about through the Grievance Redress Mechanism in a timely manner as per the IEEs	(i) Assist in the inspection and verification of contractor's post-construction activities.
Contractors	(i) Ensure EMP implementation cost is included in the methodology. (ii) Undergo EMP implementation orientation prior to award of contract (iii) Provide EMP implementation orientation to all workers prior to deployment to worksites (iv) Seek approval for camp sites and sources of materials. (v) Ensure copy of IEE is available at worksites. Summary of IEE is translated to language understood by workers and posted at visible places at all times.	(i) Implement EMP. (ii) Implement corrective actions if necessary. (iii) Prepare and submit monitoring reports including pictures to PIU (iv) Comply with all applicable legislation, is conversant with the requirements of the EMP; (v) Brief his staff, employees, and laborer about the requirements of the EMP and provide environmental awareness training to staff, employees, and laborers; (vi) Ensure any subcontractors/ suppliers who are utilized within the context of the contract comply with all requirements of the EMP. The Contractor will be held responsible for noncompliance on their behalf; (vii) Bear the costs of any damages/compensation resulting from non-adherence to the EMP or written site instructions; (viii) Ensure that PIU and ACM/ASO are timely informed of any foreseeable activities related to EMP implementation. (vi) Address any grievances	(i) Ensure EMP post-construction requirements are satisfactorily complied (ii) Request certification from PIU

Responsible	Responsibility							
Agency	Pre-Construction Stage	Construction Stage	Post-Construction					
		brought about through the						
		Grievance Redress						
		Mechanism in a timely manner						
		as per the IEEs						

C. Training Needs

119. The following **Table 11** presents the outline of capacity building program to ensure EMP implementation. The estimated cost is Rs.275,000 (excluding trainings of contractors which will be part of EMP implementation cost during construction) to be covered by the project's capacity building program. The detailed cost and specific modules will be customized for the available skill set after assessing the capabilities of the target participants and the requirements of the project by the ESS of PMDSC.

Table 11: Outline Capacity Building Program on EMP Implementation

Description	Target Participants &	Estimate (INR)	Cost and Source of
	Venue		Funds
Introduction and	All staff and consultants	INR 100,000 (Lump	PMU cost
Sensitization to	involved in the project	sum)	
Environmental Issues (1			
day)	At PMU, Jaipur		
- ADB Safeguards Policy	-		
Statement			
- Government of India and			
Rajasthan applicable			
safeguard laws,			
regulations and policies			
including but not limited to			
core labor standards,			
OH&S, etc.			
- Incorporation of EMP into			
the project design and			
contracts			
- Monitoring, reporting and			
corrective action planning			
2. EMP implementation (2	All staff and consultants	INR 50,000 (Lump	PMU cost
days)	involved in the Ton	sum)	
- Roles and responsibilities	subproject		
- OH&S planning and			
implementation	All contractors prior to		
- Wastes management	award of contract		
(water, hazardous, solid,			
excess construction	At PIU, Bhilwara		
materials, spoils, etc.)			
- Working in congested			
areas,			
- Public relations			
- Consultations			
- Grievance redress			
- Monitoring and corrective			
action planning			
- Reporting and disclosure			
- Post-construction			

Description	Target Participants & Venue	Estimate (INR)	Cost and Source of Funds
planning			
Plans and Protocols (1 day) Construction site	All staff and consultants involved in the project	Lump sum INR 25,000 (Lump sum)	PMU cost
standard operating		,	Contractors cost as
procedures (SOP) - AC pipe protocol - Site-specific EMP - Traffic management plan - Spoils management plan - Waste management plan - Chance find protocol - O&M plans - Post-construction plan	All contractors prior to award of contract or during mobilization stage. At PIU Bhilwara	Lump sum INR 25,000 (Lump sum)	compliance to contract provisions on EMP implementation (refer to EMP tables)
4. Experiences and best practices sharing - Experiences on EMP implementation - Issues and challenges - Best practices followed	All staff and consultants involved in the project All contractors All NGOs At PMU Jaipur	INR 100,000 (Lump sum)	PMU Cost
5. Contractors Orientation to Workers on EMP implementation (OH&S, core labor laws, spoils management, etc.)	All workers (including manual laborers) of the contractor prior to dispatch to worksite	Lump sum INR 25,000 (Lump sum)	Contractors cost as compliance to contract provisions on EMP implementation (refer to EMP tables)

Summary of Capacity Building cost for EMP Implementation

Contractor Cost - INR 50,000 PMU Cost - INR 275,000 **Total - INR 325,000**

D. Monitoring and Reporting

- 120. Prior to commencement of the work, the contractor will submit a compliance report to PIU ensuring that all identified pre-construction environmental impact mitigation measures as detailed in the EMP will be undertaken. PIU with the assistance of the ASO and ESS of PMDSC will review the report and thereafter PMU will allow commencement of works.
- 121. During construction, results from internal monitoring by the contractor will be reflected in their fortnightly (twice a month) EMP implementation reports to the PIU and Assistant Construction Manager of PMDSC. ASO and ACM will review and advise contractors for corrective actions if necessary. Monthly report summarizing compliance and corrective measures taken will be prepared by ASO with the assistance of ACM and submitted to PMU.
- 122. Based on monthly reports and measurements, PMU will draft, review, and submit to ADB, 6-monthly (twice a year) EMP implementation progress report (**Appendix 10**). Once concurrence from the ADB is received the report will be disclosed in the Project website.
- 123. ADB will review project performance against the RUSDP commitments as agreed in the legal documents. The extent of ADB's monitoring and supervision activities will be commensurate with the project's risks and impacts. Monitoring and supervising of social and

environmental safeguards will be integrated into the project performance management system

E. EMP Implementation Cost

124. Most of the mitigation measures require the contractors to adopt good site practice, which should be part of their normal procedures already, so there are unlikely to be major costs associated with compliance. Regardless of this, any costs of mitigation by the construction contractors or consultants are included in the budgets for the civil works and do not need to be estimated separately here. Mitigation that is the responsibility of PIU/ULB will be provided as part of their management of the project, so this also does not need to be duplicated here. Cost for the capacity building program is included as part of the project.

Table 12: Cost Estimates to Implement the EMP

	Particulars	Stages	Unit	Total Number	Rate (INR)	Cost (INR)	Costs Covered By
A.	Monitoring Measures						,
	Air quality monitoring	Construction	per sample	3 x 17 = 51	4,000	204,000	Civil works contract
	Noise levels monitoring	Construction	Per sample	3 x 17 = 51	1,500	76,500	Civil works contract
	Subtotal (A)					280,500	
B.	Capacity Building						
1.	Introduction and sensitization to environment issues	Pre- construction	lump sum			100,000	PMU
2.	EMP implementation	Construction	lump sum			50,000	PMU
3.	Plans and Protocols	Construction	lump sum			25,000	PMU
			lump sum			25,000	Civil works contract
4.	Experiences and best practices sharing	Construction/ Post- Construction	lump sum			100,000	PMU
5.	Contractors Orientation to Workers on EMP implementation	Prior to dispatch to worksite	Lump sum			25,000	Civil works contract
	Subtotal (B)					325,000	
C	Civil Works						
1	Construction of shelters for workers.	Construction	Lump sum			770,000	Civil works contract
2	Providing Water Supply Facility for the workers	Construction	Lump sum			250,000	Civil works contract
3	Providing Sanitation Facility for the workers	Construction	Lump sum			160,000	Civil works contract
5	Barricading to a height	Construction	m2	8,978	126	1,131,165	Civil

	Particulars	Stages	Unit	Total Number	Rate (INR)	Cost (INR)	Costs Covered By
	of 1.8 m (frame with MS pipes and cover with corrugated sheets)						works contract
6	Traffic management (Pavement Markings, Channelizing Devices, Arrow Panels and Warning Lights)	Construction	Per unit (at each location)	10	3000	300,000	Civil works contract
	Sub Total (C)					2,611,165	
	Total (A+B+C)				INR	3,216,665	

Contractor Cost - 2,941,665 PMU Cost - 275,000 **Total - 3,216,665**

VIII. CONCLUSION AND RECOMMENDATION

- 125. The process described in this document has assessed the environmental impacts of all elements of the Bhilwara sewerage subproject. All potential impacts were identified in relation to pre-construction, construction, and operation phases. Planning principles and design considerations have been reviewed and incorporated into the site planning and design process wherever possible; thus, environmental impacts as being due to the project design or location were not significant. During the construction phase, impacts mainly arise from the construction dust and noise, the need to dispose of large quantities of waste soil and import a similar amount of sand to support the sewer in the trenches; and from the disturbance of residents, businesses, traffic and important buildings by the construction work. The social impacts (access disruptions) due to construction activities are unavoidable, as the residential and commercial establishments exist along the roads where pipes/sewers will be laid. A resettlement plan has been developed in accordance with ADB SPS 2009 and Government of India laws and regulations.
- 126. Anticipated impacts of sewerage system during operation and maintenance will be related to repair of blocks, overflows and leakages in sewers. Sewers are not 100% watertight and leaks can occur at joints. Faulty section will be exposed and repaired following the same basic procedure as when the sewer was built. Also, sewer pipes require regular maintenance as silt inevitably collects in areas of low flow over time. Necessary equipment for cleaning and removal of blockages in the sewers are included in the project.
- 127. The public participation processes undertaken during project design ensured stakeholders are engaged during the preparation of the IEE. The planned information disclosure measures and process for carrying out consultation with affected people will facilitate their participation during implementation. The project's grievance redressal mechanism will provide the citizens with a platform for redressal of their grievances, and describes the channels, time frame, and mechanisms for resolving complaints about environmental performance.
- 128. The EMP will assist the PMU, PIU, PMDSC and contractors in mitigating the environmental impacts, and guide them in the environmentally sound execution of the proposed project. The EMP will also ensure efficient lines of communication between PIU/ULB, PMU, consultants and contractor. A copy of the EMP shall be kept on-site during the construction

period at all times. The EMP shall be made binding on all contractors operating on the site, and will be included in the contractual clauses. Non-compliance with, or any deviation from, the conditions set out in this document shall constitute a failure in compliance.

- 129. The project will benefit the general public by contributing to the long-term improvement of sewerage system and community livability in Bhilwara. The potential adverse environmental impacts are mainly related to the construction period, which can be minimized by the mitigating measures and environmentally sound engineering and construction practices.
- 130. Therefore, as per ADB SPS, the project is classified as environmental category B and does not require further environmental impact assessment.

Subproject Sites Photographs





Photo 4: Survey of vendors on busy street



Photo 2: Busy narrow road in old town



Photo 5: Wide roads with unpaved shoulders



Photo 3: Wide roads with avenue trees



Photo 6: Busy road with on-street activities

Appendix 1: REA Check list

WATER SUPPLY

Instructions:

- □ This checklist is to be prepared to support the environmental classification of a project. It is to be attached to the environmental categorization form that is to be prepared and submitted to the Chief Compliance Officer of the Regional and Sustainable Development Department.
- ☐ This checklist is to be completed with the assistance of an Environment Specialist in a Regional Department.
- □ This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB checklists and handbooks on (i) involuntary resettlement, (ii) indigenous peoples planning, (iii) poverty reduction, (iv) participation, and (v) gender and development.
- □ Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title: Rajasthan Urban Sector Development Program / Bhilwara Subproject

Sector Division: Urban Development

SCREENING QUESTIONS	Yes	No	REMARKS
A. Project Siting Is the project			
area			
Densely populated?	\[Subproject activities extend to the entire town including the densely populated areas. There are no major negative impacts envisaged, because pipeline will be located in unused government lands alongside the existing roads and can be constructed without causing disturbance to, houses, and commercial establishments. In narrow streets, disruption to road users is likely, and measure like best activity scheduling, alternative routes, prior information to road users, houses and shops will minimize the impact to acceptable levels.
Heavy with development activities?	1		Bhilwara is a developing town; urban expansion is considerable
Adjacent to or within any environmentally sensitive areas?		V	
Cultural heritage site		\checkmark	
Protected Area		$\sqrt{}$	
Wetland		$\sqrt{}$	
Mangrove		$\sqrt{}$	
Estuarine		$\sqrt{}$	
Buffer zone of protected area		$\sqrt{}$	
Special area for protecting biodiversity		V	
Bay		$\sqrt{}$	

SCREENING QUESTIONS	Yes	No	REMARKS
Sewerage	162	INO	REWIARRS
Potential Environmental Impacts			
Will the Project cause			
impairment of historical/cultural monuments/areas and loss/damage to these sites?		√	No
interference with other utilities and blocking of access to buildings; nuisance to neighboring areas due to noise, smell, and influx of insects, rodents, etc.?	V		Sewers will be laid underground, and will be located away from water lines maintaining the minimum distance according to standards. Construction work may interfere with the power and communication lines, but resultant impact will be minimized with coordination of concerned agencies in finalization of best alignment and shifting of utilities, if required.
dislocation or involuntary resettlement of people	√		Project does not involve land acquisition / involuntary resettlement /displacement. During the sewer construction, particularly in narrow streets and streets with on street commercial activities, there may be temporary disruption or relocation of hawkers and vendors. These are addressed through preparation of resettlement plan.
Impairment of downstream water quality due to inadequate sewage treatment or release of untreated sewage?		√	Sewage treatment facilities are under construction, no new facilities are proposed in the project
Overflows and flooding of neighboring properties with raw sewage?		1	Sewerage system is designed following standards. Flooding and overflowing will be avoided through regular operation and maintenance
Environmental pollution due to inadequate sludge disposal or industrial waste discharges illegally disposed in sewers?		V	Sewage treatment facilities are already in place, no new facilities are constructed in the project This sewerage system will cater only to domestic wastewater, no industrial wastewater discharge is allowed into the sewerage system.
Noise and vibration due to blasting and other civil works?		V	Blasting for underground works is unlikely, mainly because of geological setting. Road cutting works for sewers is likely to generate noise. Scheduling of works appropriately and prior information to the affected people will minimize the impact.
Discharge of hazardous materials into sewers, resulting in damage to sewer system and danger to workers?		V	This sewerage system will cater only to domestic wastewater, no industrial wastewater discharge is allowed into the sewerage system. As a precaution, domestic wastewater from industrial units will also not be allowed into sewers.
Inadequate buffer zone around pumping and treatment plants to alleviate noise and other possible nuisances, and protect facilities?		V	There are no pumping stations in the project

SCREENING QUESTIONS	Yes	No	REMARKS
Social conflicts between construction workers from other areas and community workers?		V	The contractor will be utilizing the local labour force as far as possible; in case if it is unavoidable, labour camps and facilities will be provided appropriately. No conflicts envisaged
Road blocking and temporary flooding due to land excavation during the rainy season?		√ 	Underground construction works (sewer laying, foundations) will be carried out in non-monsoon period. In Bhilwara, rainfall is very less and confined only to a limited period. No impacts envisaged
Noise and dust from construction activities?	√ 		Road cutting (cement and bituminous roads) for sewer laying works is likely to generate noise. Scheduling of works appropriately and prior information to the affected people will minimize the impact. Dust generation will be controlled through water sprinkling, immediate transportation of excess soil, covered transport etc.
traffic disturbances due to construction material transport and wastes?	V		Linear activities like sewer laying along the roads is likely to disrupt traffic. Vehicle movement for construction purpose will increase the traffic. Identification of alternate routes, allowing limited - at least one-way traffic, prior information about the works and alternative arrangements, providing information/sign boards etc. will reduce the impact.
temporary silt runoff due to construction?		V	Bhilwara is predominantly dry and rainfall is limited
hazards to public health due to overflow flooding, and groundwater pollution due to failure of sewerage system?	√ 		Sewerage system will be designed with applicable standards. Adequate trained staff and necessary equipment will be in place for regular operation and maintenance of the system. Proposed treatment system will be efficient and appropriate repair and maintenance procedure will be developed. Sufficient funds for operation will be ensured. Backup power supply system is part of project.
deterioration of water quality due to inadequate sludge disposal or direct discharge of untreated sewage water?		V	No treatment plant proposed in this project; existing facilities will be utilized for the purpose.
contamination of surface and ground waters due to sludge disposal on land?		√	No treatment plant proposed in this project; existing facilities will be utilized for the purpose.
Health and safety hazards to workers from toxic gases and hazardous materials which may be contained in sewage flow and exposure to pathogens in sewage and sludge?		V	Necessary apparatus and personal protection equipment will be provided. Staff will be trained in safe handling of sewage and in cleaning of sewers

Climate Change and Disaster Risk Questions			
The following questions are not for environmental categorization. They are included in this checklist to help identify potential climate and disaster risks.	Yes	No	Remarks
Is the Project area subject to hazards such as earthquakes, floods, landslides, tropical cyclone winds, storm surges, tsunami or volcanic eruptions and climate changes?	V		Semi-arid zone, low rainfall
Could changes in temperature, precipitation, or extreme events patterns over the Project lifespan affect technical or financial sustainability (e.g., changes in rainfall patterns disrupt reliability of water supply; sea level rise creates salinity intrusion into proposed water supply source)?	√		Promote more efficient use of water by reducing losses and wastage to counter increased demands due to higher temperatures.
Are there any demographic or socio-economic aspects of the Project area that are already vulnerable (e.g., high incidence of marginalized populations, rural-urban migrants, illegal settlements, ethnic minorities, women or children)?		V	No
Could the Project potentially increase the climate or disaster vulnerability of the surrounding area (e.g., by using water from a vulnerable source that is relied upon by many user groups, or encouraging settlement in earthquake zones)?		√	No

Appendix 2: National Ambient Air Quality Standards

SL NO:	Pollutants	Time weighted	Concentration in ar	nbient air	Method of measurement
NO.		average	Industrial, Residential, Rural & Other Areas	Ecologically Sensitive Areas	
1	Sulphur Dioxide (SO ₂) µg/m ³	Annual 24 hours	50 80	20 80	Improved West and Geake- Ultraviolet fluorescence
2	Nitrogen Dioxide (NO ₂) µg/m ³	Annual 24 hours	40 80	30 80	Modified Jacob & Hochheiser (Na-Arsenite) Chemiluminescence
3	Particulate Matter (Size less than 10 µm) or PM10 µg/m ³	Annual 24 hours	60 100	60 100	Gravimetric -TOEM -Beta attenuation
4	Particulate Matter (Size less than 2.5 µm) or PM2.5 µg/m³	Annual 24 hours	40 60	40 60	Gravimetric -TOEM -Beta attenuation
5	Carbon Monoxide (CO) mg/m ³	8 hours 1 hours	02 04	02 04	Non Dispersive Infra Red (NDIR) Spectroscopy

Appendix 3: National Ambient Air Quality Standards in Respect of Noise

Area code	Category of area/zone	Limit in dB (A)		
		Day time	Night time	
Α	Industrial area	75	70	
В	Commercial area	65	55	
С	Residential area	55	45	
D	Silence zone	50	40	

Appendix 4: General Standards for Discharge of Environmental Pollutants (Wastewater)

	T _	(Wastewater)	T =	T
S. No.	Parameter	Inland surface water	Public sewers	Land for irrigation
	2		3	
		(a)	(b)	(c)
1	Suspended solids mg/l, max.	100	600	200
2	Particle size of suspended solids	shall pass 850 micron IS Sieve	-	-
3	pH value	5.5 to 9.0	5.5 to 9.0	5.5 to 9.0
4	Temperature	shall not exceed 5oC above the receiving water temperature		
5	Oil and grease, mg/l max,	10	20	10
6	Total residual chlorine, mg/l max	1.0	-	-
7	Ammonical nitrogen (as N),mg/l, max.	50	50	-
8	Total kjeldahl nitrogen (as N);mg/l, max. mg/l, max.	100	-	-
9	Free ammonia (as NH3), mg/l,max.	5.0	-	-
10	Biochemical oxygen demand (3 days at 27oC), mg/l, max.	30	350	100
11	Chemical oxygen demand, mg/l, max.	250	-	-
12	Arsenic(as As).	0.2	0.2	0.2
13	Mercury (As Hg), mg/l, max.	0.01	0.01	-
14	Lead (as Pb) mg/l, max	0.1	1.0	-
15	Cadmium (as Cd) mg/l, max	2.0	1.0	-
16	Hexavalent chromium (as Cr + 6),mg/l, max.	0.1	2.0	-
17	Total chromium (as Cr) mg/l, max.	2.0	2.0	-
18	Copper (as Cu)mg/l, max.	3.0	3.0	-
19	Zinc (as Zn) mg/l, max.	5.0	15	-
20	Selenium (as Se)	0.05	0.05	-
21	Nickel (as Ni) mg/l, max.	3.0	3.0	-
22	Cyanide (as CN) mg/l, max.	0.2	2.0	0.2
23	Fluoride (as F) mg/l, max.	2.0	15	-
24	Dissolved phos- phates (as P),mg/l, max.	5.0	-	-
25	Sulphide (as S) mg/l, max.	2.0	-	-
26	Phenolic compounds (as C6H50H)mg/l, max.	1.0	5.0	-
27	Radioactive materials: (a) Alpha emitters micro curie mg/l, max.	10-7	10-7	10-8
	(b)Beta emittersmicro curie mg/l	10-6	10-6	10-7
28	Bio-assay test	90% suivival of fish after 96 hours in 100% effluent	90% survival of fish after 96 hours in 100% effluent	90% suivival of fish after 96 hours in 100% effluent
29	Manganese	2 mg/l	2 mg/l	-
30	Iron (as Fe)	3mg/l	3mg/l	-
31	Vanadium (as V)	0.2mg/l	0.2mg/l	-
32	Nitrate Nitrogen	10 mg/l	-	-

Appendix 5: Vehicle Exhaust Emission Norms

1. Passenger Cars

Norms	CO(g/km)	HC+ NOx(g/km)
1991Norms	14.3-27.1	2.0(Only HC)
1996 Norms	8.68-12.40	3.00-4.36
1998Norms	4.34-6.20	1.50-2.18
India stage 2000 norms	2.72	0.97
Bharat stage-II	2.2	0.5
Bharat Stage-III	2.3	0.35 (combined)
Bharat Stage-IV	1.0	0.18 (combined)

2. Heavy Diesel Vehicles

Norms	CO(g/kmhr)	HC (g/kmhr)	NOx (g/kmhr)	PM(g/kmhr)
1991Norms	14	3.5	18	-
1996 Norms	11.2	2.4	14.4	-
India stage 2000 norms	4.5	1.1	8.0	0.36
Bharat stage-II	4.0	1.1	7.0	0.15
Bharat Stage-III	2.1	1.6	5.0	0.10
Bharat Stage-IV	1.5	0.96	3.5	0.02

Source: Central Pollution Control Board

CO = Carbon Monixide; g/kmhr = grams per kilometer-hour; HC = Hydrocarbons; NOx = oxides of nitrogen; PM = Particulates Matter

Appendix 6: Drinking Water Standards

No.	Substance or characteristic	Requirement Desirable limit	Undesirable effect outside the desirable	Permissible limit in the absence of alternate Source	Remarks
	ntial Characteristic	Τ	T	•	
1.	Colour Hazen Units, Max	5	Above 5, consumer acceptance decreases	25	Extended to 25 only if toxic Substance are not suspect in absence of alternate sources
2.	Odour	Unobjectiona ble	-	-	a) test cold and when heated b) test are several dilutions
3.	Taste	Agreeable	-	-	Test to be conducted only after safely has been established
4.	Turbidity (NTU) Max	5	Above 5, consumer acceptance decreases	10	-
5.	pH value	6.5 to 8.5	Beyond this range the water will after the mucous membrane and/or water supply system	No relaxation	-
6.	Total Hardness (mg/L) CaCO3	300	Encrustation in water supply structure and adverse effects on domestic use	600	-
7.	Iron (mg/L, Fe) Max	0.3	Beyond this limit taste/appearance are affected; has adverse effects on domestic uses and water supply structure and promotes iron bacteria	1.0	-
8.	Chlorides 250 (mg/L, Cl) Max	250	Beyond effects outside the desirable limit	1000	-
9.	Residual free Chlorine (mg/L), Max	0.2	-	-	To be applicable only when water is chlorinated. Tested at customer end. When protection against viral infection is required, it should be min. 0.5 mg/L.
	rable Characteristics	T =	T =	T	
10.	Dissolved solids mg/L. Max	500	Beyond this, palatability decreases and may cause gastrointestinal irritation.	2000	-
11.	Calcium (mg/L, Ca) Max.	75	Encrustation in water supply structure and adverse effects on domestic use.	200	-
12.	Magnesium (mg/L, Mg) Max	30	Encrustation in water supply structure and adverse effects on domestic use.	100	-
13.	Copper (mg/L, Cu) Max	0.05	Astringent taste dis coloration and corrosion of pipes fittings and utensils	1.5	-

No.	Substance or characteristic	Requirement Desirable limit	Undesirable effect outside the desirable	Permissible limit in the absence of alternate Source	Remarks
			will be caused beyond this.		
14.	Manganese (mg/L, Mn) Max	0.1	Beyond this limit taste/appearance are affected, has advers effect on domestic use and water supply structure	0.3	-
15.	Sulphate (mg/L, SO4) Max.	200	Beyond this causes gastro intestinal irritation when magnesium or sodium are present	400	May be extended upto 400 provided magnesium (as Mg) does not exceed 30
16.	Nitrate (mg/L, NO3) Max.	45	Beyond this methaemo globinemia takes place.	100	-
17.	Fluoride (mg/L, F) Max.	1.0	Fluoride may be kept as low as possible. High fluoride may cause fluorosis.	1.5	-
18.	Phenolic Compounds (mg/L C6H5OH) Max.	0.001	Beyond this, it may cause objectionable taste and odour	0.002	-
19.	Mercury (mg/L Hg) Max	0.001	Beyond this the water becomes toxic	No Relaxation.	To be tested when pollution is suspected
20	Cadmium (mg/L, Cd) Max	0.01	Beyond this the water becomes toxic	No Relaxation.	To be tested when pollution is suspected
21.	Selenium (mg/L, Se) Max	0.01	Beyond this the water becomes toxic.	No Relaxation.	To be tested when pollution is suspected
22.	Arsenic (mg/L, As) Max.	0.05	Beyond this the water becomes toxic	No Relaxation	To be tested when pollution is suspected
23.	Cyanide	0.05	Beyond this the water becomes toxic	No Relaxation	To be tested when pollution is suspected
24.	Lead (mg/L Pb) Max.	0.05	Beyond this the water becomes toxic	No Relaxation	To be tested when pollution is suspected
25.	Zinc (mg/L, Zn) Max.	5	Beyond this limit it can cause astringent taste and an opalescence in water	15	To be tested when pollution is suspected
26.	Anionic detergents (mg/L, MBAS) Max	0.2	Beyond this limit it can cause a light froth in water	1.0	To be tested when pollution is suspected
27.	Chromium (mg/L, Cr6+	0.05	May be carcinogenic above this limit	-	-
28.	Polynuclear Aromatic Hydrocarbons (mg/l, PAH) Max	-	May be carcinogenic	-	-
29.	Mineral oil (mg/L)	0.01	Beyond this limit, undesirable taste and odour after chlorination takes place	0.03	To be tested when pollution is suspected
30.	Pesticides (mg/L) max	Absent	Toxic	0.001	-
Radi	pactive materials				
31.	Alpha emitters Bq/L Max	-	-	0.1	-
32.	Beta emitters Pci/L Max	-	-	1.0	-
33.	Alkalinity (mg/L,) Max	200	Beyond this limit, taste becomes unpleasant	600	-

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No.	Substance or characteristic	Requirement Desirable limit	Undesirable effect outside the desirable	Permissible limit in the absence of alternate Source	Remarks
34.	Aluminum (mg/L, Al) Max	0.03	Cumulative effect is reported to cause dementia	0.2	
35.	Boron (mg/L) Max	1.0	-	5.0	-

Appendix 7 Compliance with Environmental Criteria for Subproject Selection

Applicability	Environmental Selection Criteria	Compliance
All Subprojects	i. Comply with all requirements of relevant national and state laws.	Being complied
	ii. Avoid significant environmental impacts.	Being complied
	iii. Avoid and/or minimize involuntary resettlement by prioritizing	Complied
	rehabilitation over new construction, using vacant government land	
	where possible, and taking all possible measures in design and	
	selection of site or alignment to avoid resettlement impacts	
	iv. Avoid locating subprojects in forest areas	Complied
	v. If there are underground asbestos cement (AC) pipes in the	Being complied
	existing systems, the project design should include that the AC pipes	
	are left undisturbed in the ground	
	vi. Prior to site clearance & trench exaction for pipes/sewers, exact	
	location of underground AC pipes should be ascertain with the Public	
	Health Engineering Department (PHED)	
	vii. Avoid where possible, and minimize to extent feasible, facilities in	Complied
	locations with social conflicts.	
	viii. Avoid where possible locations that will result in	Being complied
	destruction/disturbance to historical and cultural places/values.	
	ix. Avoid tree-cutting where possible. Retain mature roadside trees	Being complied
	which are important/valuable or historically significant. If any trees	
	have to be removed, plant two new trees for every one that is lost.	
	x. Ensure all planning and design interventions and decisions are	Being complied
	made in consultation with local communities and include women.	
	Reflect inputs from public consultation and disclosure for site	
	selection.	
Sewerage	i. Comply with all requirements of relevant national and local laws,	Being complied
	rules, and guidelines.	
	ii. Ensure no immediate downstream drinking water intakes at	Being complied
	treated wastewater disposal point.	Al (P II
	iii. Locate sewage treatment plant (STP) preferably 500 m from any	Not applicable
	inhabited areas, in locations where no urban expansion is expected in	
	the next 20 years, so that people are not affected by odor or other	
	nuisance from the STP.	Not applicable
	iv. Locate facilities where there is a suitable means of disposal for	Not applicable
	the treated wastewater effluent and bio-solids.	Not applied:
	v. Locate facilities where there is no risk of flooding or other hazards	Not applicable
	that might impair operations and present a risk of damage to the	
	facilities or its environs.	Daing complied
	vi. Ensure appropriate training will be provided to ULB staffs on the	Being complied
	operations and maintenance of the facilities.	Complied
	vii. Locate sewage pipelines on roads RoW wherever feasible, to reduce the acquisition of new land	Compiled
	reduce the acquisition of new land	

Appendix 8: Salient Features of Major Labor Laws Applicable to Establishments Engaged in Construction of Civil Works

- (i) Workmen Compensation Act, 1923 The Act provides for compensation in case of injury by accident arising out of and during the course of employment.
- (ii) Payment of Gratuity Act, 1972 Gratuity is payable to an employee under the Act on satisfaction of certain conditions on separation if an employee has completed 5 years' service or more or on death at the rate of 15 days wages for every completed year of service. The Act is applicable to all establishments employing 10 or more employees.
- (iii) Employees' PF and Miscellaneous Provisions Act, 1952 The Act provides for monthly contributions by the employer plus workers @10 % or 8.33 %. The benefits payable under the Act are: (a) Pension or family pension on retirement or death as the case may be; (b) deposit linked insurance on the death in harness of the worker; (c) payment of PF accumulation on retirement/death etc.
- (iv) Maternity Benefit Act, 1951 The Act provides for leave and some other benefits to women employees in case of confinement or miscarriage etc.
- (v) Contract Labour (Regulation and Abolition) Act, 1970 The Act provides for certain welfare measures to be provided by the Contractor to contract labor and in case the Contractor fails to provide, the same are required to be provided by the Principal Employer by Law. The principal employer is required to take Certificate of Registration and the Contractor is required to take a License from the designated Officer. The Act is applicable to the establishments or Contractor of principal employer if they employ 20 or more contract labor.
- (vi) Minimum Wages Act, 1948 The employer is supposed to pay not less than the Minimum Wages fixed by appropriate Government as per provisions of the Act if the employment is a scheduled employment. Construction of Buildings, Roads, Runways are scheduled employment.
- (vii) Payment of Wages Act, 1936 It lays down as to by what date the wages are to be paid, when it will be paid and what deductions can be made from the wages of the workers.
- (viii) Equal Remuneration Act, 1979 The Act provides for payment of equal wages for work of equal nature to Male and Female workers and not for making discrimination against Female employees in the matters of transfers, training and promotions etc.
- (ix) Payment of Bonus Act, 1965 The Act is applicable to all establishments employing 20 or more workmen. The Act provides for payments of annual bonus subject to a minimum of 8.33 % of wages and maximum of 20 % of wages to employees drawing Rs. 3,500/- per month or less. The bonus to be paid to employees getting Rs. 2,500/- per month or above up to Rs.3,500/- per month shall be worked out by taking wages as Rs.2,500/- per month only. The Act does not apply to certain establishments. The newly set up establishments are exempted for five years in certain circumstances. Some of the State Governments have reduced the employment size from 20 to 10 for the purpose of applicability of the Act.
- (x) Industrial Disputes Act, 1947 The Act lays down the machinery and procedure for resolution of industrial disputes, in what situations a strike or lock-out becomes illegal and what

are the requirements for laying off or retrenching the employees or closing down the establishment.

- (xi) Industrial Employment (Standing Orders) Act, 1946 It is applicable to all establishments employing 100 or more workmen (employment size reduced by some of the States and Central Government to 50). The Act provides for laying down rules governing the conditions of employment by the employer on matters provided in the Act and get the same certified by the designated Authority.
- (xii) Trade Unions Act, 1926 The Act lays down the procedure for registration of trade unions of workmen and employees. The trade unions registered under the Act have been given certain immunities from civil and criminal liabilities.
- (xiii) Child Labor (Prohibition and Regulation) Act, 1986 The Act prohibits employment of children below 14 years of age in certain occupations and processes and provides for regulation of employment of children in all other occupations and processes. Employment of child labor is prohibited in Building and Construction Industry.
- (xiv) Inter-State Migrant Workmen's (Regulation of Employment and Conditions of Service) Act, 1979 The Act is applicable to an establishment which employs 5 or more inter-state migrant workmen through an intermediary (who has recruited workmen in one state for employment in the establishment situated in another state). The inter-state migrant workmen, in an establishment to which this Act becomes applicable, are required to be provided certain facilities such as housing, medical aid, traveling expenses from home up to the establishment and back, etc.
- (xv) The Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996 and the Cess Act of 1996 All the establishments who carry on any building or other construction work and employ 10 or more workers are covered under this Act. All such establishments are required to pay Cess at rate not exceeding 2% of the cost of construction as may be notified by the Government. The employer of the establishment is required to provide safety measures at the building or construction work and other welfare measures, such as canteens, first-aid facilities, ambulance, housing accommodation for workers near the workplace etc. The employer to whom the Act applies has to obtain a registration certificate from the Registering Officer appointed by the Government.

Appendix 9: Sample Outline Spoil Management Plan

- The Spoil Management Plan should be site specific and be part of the monthly Construction Management Plan.
- The contractor, in consultation with the ULB, has to find out appropriate location/s for the disposal of the excess soil generated. The spoils should be deposited only at these sites.
- Further precautions need to be taken in case of the contaminated spoils.
- The vehicle carrying the spoil should be covered properly.
- The spoils generating from each site should be removed on the same day or immediately after the work is complete. The site / road should be restored to the original condition.

I. Spoils information

The spoil information contains the details like a) The type / material, b) Potential contamination by that type, c) Expected volume (site / component specific), d) Spoil Classification etc.

II. Spoils management

The Spoil Management section gives the details of a) Transportation of spoil b) disposal site details c) Precautions taken d) Volume of contaminated spoil, if present, d) Suggested reuse of disposal of the spoil

III. Documentation

The volume of spoil generated (site specific, date wise), site disposed, reuse / disposal details should be documented properly.

Appendix 10: Sample Outline Traffic Management Plan

A. Principles for TMP around the Water Pipes/Sewer Construction Sites

- 1. One of the prime objectives of this TMP is to ensure the safety of all the road users along the work zone, and to address the following issues:
 - (i) the safety of pedestrians, bicyclists, and motorists travelling through the construction zone;
 - (ii) protection of work crews from hazards associated with moving traffic;
 - (iii) mitigation of the adverse impact on road capacity and delays to the road users;
 - (iv) maintenance of access to adjoining properties; and
 - (v) addressing issues that may delay the project.

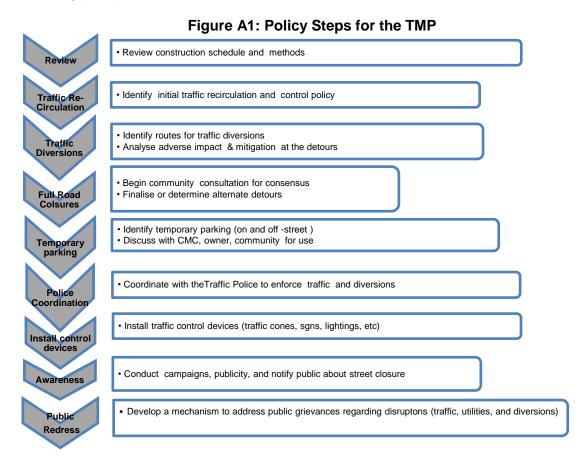
B. Operating Policies for TMP

- 2. The following principles will help promote safe and efficient movement for all road users (motorists, bicyclists, and pedestrians, including persons with disabilities) through and around work zones while reasonably protecting workers and equipment.
 - (i) Make traffic safety and temporary traffic control an integral and high-priority element of project from planning through design, construction, and maintenance.
 - (ii) Inhibit traffic movement as little as possible.
 - (iii) Provide clear and positive guidance to drivers, bicyclists, and pedestrians as they approach and travel through the temporary traffic control zone.
 - (iv) Inspect traffic control elements routinely, both day and night, and make modifications when necessary.
 - (v) Pay increased attention to roadside safety in the vicinity of temporary traffic control zones.
 - (vi) Train all persons that select, place, and maintain temporary traffic control devices.
 - (vii) Keep the public well informed.
 - (viii) Make appropriate accommodation for abutting property owners, residents, businesses, emergency services, railroads, commercial vehicles, and transit operations.
- 3. **Figure A2 to Figure A12** illustrates the operating policy for TMP for the construction of water pipes and the sewers along various types of roads.

C. Analyze the impact due to street closure

- 4. Apart from the capacity analysis, a final decision to close a particular street and divert the traffic should involve the following steps:
 - (i) approval from the ULB/ Public Works Department (PWD) to use the local streets as detours:
 - (ii) consultation with businesses, community members, traffic police, PWD, etc., regarding the mitigation measures necessary at the detours where the road is diverted during the construction;
 - (iii) determining of the maximum number of days allowed for road closure, and incorporation of such provisions into the contract documents;

- (iv) determining if additional traffic control or temporary improvements are needed along the detour route;
- (v) considering how access will be provided to the worksite;
- (vi) contacting emergency service, school officials, and transit authorities to determine if there are impacts to their operations; and
- (vii) developing a notification program to the public so that the closure is not a surprise. As part of this program, the public should be advised of alternate routes that commuters can take or will have to take as result of the traffic diversion.
- 5. If full road-closure of certain streets within the area is not feasible due to inadequate capacity of the detour street or public opposition, the full closure can be restricted to weekends with the construction commencing on Saturday night and ending on Monday morning prior to the morning peak period.



D. Public awareness and notifications

6. As per discussions in the previous sections, there will be travel delays during the constructions, as is the case with most construction projects, albeit on a reduced scale if utilities and traffic management are properly coordinated. There are additional grounds for travel delays in the area, as most of the streets lack sufficient capacity to accommodate additional traffic from diverted traffic as a result of street closures to accommodate the works.

Appendix 10 77

- 6. The awareness campaign and the prior notification for the public will be a continuous activity which the project will carry out to compensate for the above delays and minimize public claims as result of these problems. These activities will take place sufficiently in advance of the time when the roadblocks or traffic diversions take place at the particular streets. The reason for this is to allow sufficient time for the public and residents to understand the changes to their travel plans. The project will notify the public about the roadblocks and traffic diversion through public notices, ward level meetings and city level meeting with the elected representatives.
- 7. The PIU will also conduct an awareness campaign to educate the public about the following issues:
 - (i) traffic control devices in place at the work zones (signs, traffic cones, barriers, etc.);
 - (ii) defensive driving behaviour along the work zones; and
 - (iii) reduced speeds enforced at the work zones and traffic diversions.
- 8. It may be necessary to conduct the awareness programs/campaigns on road safety during construction.
- 9. The campaign will cater to all types of target groups i.e. children, adults, and drivers. Therefore, these campaigns will be conducted in schools and community centres. In addition, the project will publish a brochure for public information. These brochures will be widely circulated around the area and will also be available at the PIU, and the contractor's site office. The text of the brochure should be concise to be effective, with a lot of graphics. It will serve the following purpose:
 - (i) explain why the brochure was prepared, along with a brief description of the project;
 - (ii) advise the public to expect the unexpected;
 - (iii) educate the public about the various traffic control devices and safety measures adopted at the work zones;
 - (iv) educate the public about the safe road user behaviour to emulate at the work zones:
 - (v) tell the public how to stay informed or where to inquire about road safety issues at the work zones (name, telephone, mobile number of the contact person; and
 - (vi) indicate the office hours of relevant offices.

E. Install traffic control devices at the work zones and traffic diversion routes

- 10. The purpose of installing traffic control devices at the work zones is to delineate these areas to warn, inform, and direct the road users about a hazard ahead, and to protect them as well as the workers. As proper delineation is a key to achieve the above objective, it is important to install good traffic signs at the work zones. The following traffic control devices are used in work zones:
 - Signs
 - Pavement Markings
 - Channelizing Devices
 - Arrow Panels
 - Warning Lights

- 11. Procedures for installing traffic control devices at any work zone vary, depending on road configuration, location of the work, construction activity, duration, traffic speed and volume, and pedestrian traffic. Work will take place along major roads, and the minor internal roads. As such, the traffic volume and road geometry vary. The main roads carry considerable traffic; internal roads in the new city areas are wide but in old city roads very narrow and carry considerable traffic. However, regardless of where the construction takes place, all the work zones should be cordoned off, and traffic shifted away at least with traffic cones, barricades, and temporary signs (temporary "STOP" and "GO").
- 12. **Figure A2 to Figure A12** illustrates a typical set-up for installing traffic control devices at the work zone of the area, depending on the location of work on the road way, and road geometrics:
 - Work on shoulder or parking lane
 - Shoulder or parking lane closed on divided road
 - Work in Travel lane
 - Lane closure on road with low volume
 - Lane closure on a two-line road with low volume (with yield sign)
 - Lane closure on a two-line road with low volume (one flagger operation)
 - Lane closure on a two lane road (two flagger operation)
 - Lane closure on a four lane undivided Road
 - Lane closure on divided roadway
 - Half road closure on multi-lane roadway
 - Street closure with detour
- 13. The work zone should take into consideration the space required for a buffer zone between the workers and the traffic (lateral and longitudinal) and the transition space required for delineation, as applicable. For the works, a 30 cm clearance between the traffic and the temporary STOP and GO signs should be provided. In addition, at least 60 cm is necessary to install the temporary traffic signs and cones.
- 14. Traffic police should regulate traffic away from the work zone and enforce the traffic diversion result from full street closure in certain areas during construction. Flagggers/personnel should be equipped with reflective jackets at all times and have traffic control batons (preferably the LED type) for regulating the traffic during night time.
- 16. In addition to the delineation devices, all the construction workers should wear fluorescent safety vests and helmets in order to be visible to the motorists at all times. There should be provision for lighting beacons and illumination for night constructions.

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WORK

AHEAD

Figure A2 & A3: Work on shoulder or parking lane & Shoulder or parking lane closed on divided road

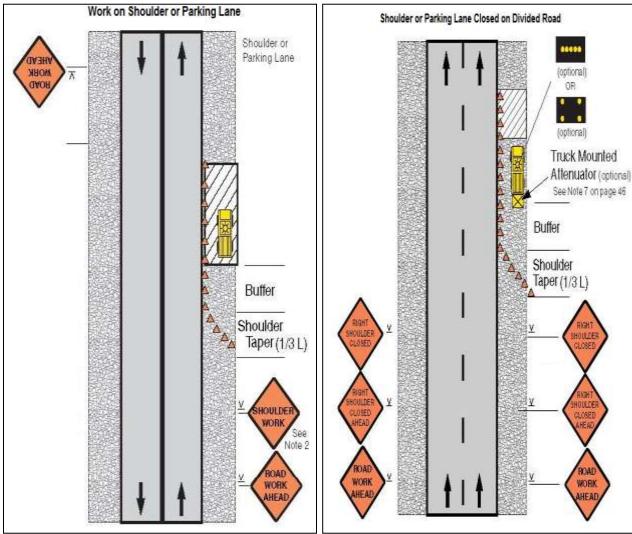
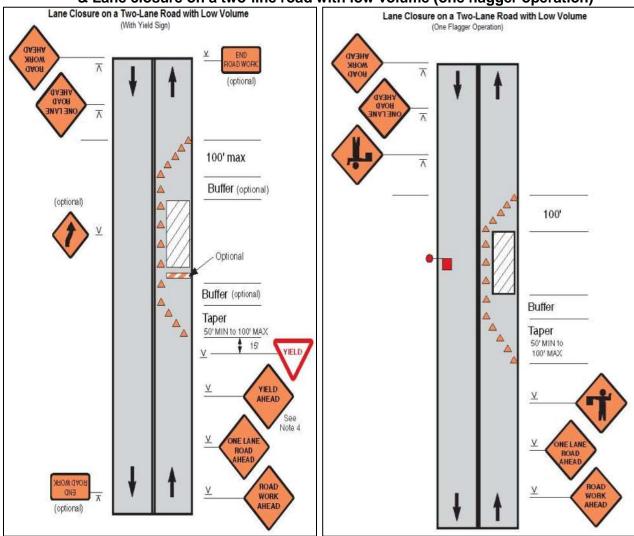


Figure A4 & A5: Work in Travel lane & Lane closure on road with low volume Work in Travel Lane Lane Closure on Road with Low Volume (No Flagger, Traffic Self Regulating, 35 MPH or Less) Λ $\overline{\Lambda}$ Shifting Taper (1/2 L) 100 Buffer Shifting Taper (1/2 L) Δ Buffer (optional) Δ Buffer 4 Taper 50' MIN to 100' MAX Shiffing Taper (1/2 L)

Figure A6 & A7: Lane closure on a two-line road with low volume (with yield sign) & Lane closure on a two-line road with low volume (one flagger operation)

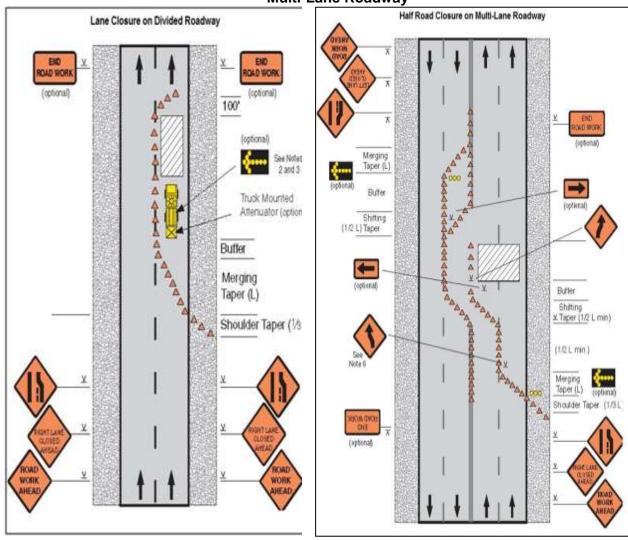


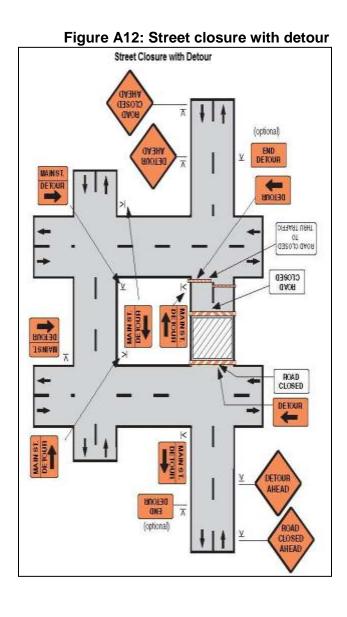
Lane Closure on a Two-Lane Road Lane closure on a Four-Lane Undivided Road (Two Flagger Operation) DAHH MORK END ROAD WORK (optional) 100' Buffer ROAD WORK (Optional) 200 to 100 300 Buffer (optional) Merging See Notes 0000▲ Buffer 1 and 2 Taper (L) Δ Taper 50' MIN to 100' MAX HOAD WORK $\overline{\Lambda}$ END ROAD WORK END V (optional) (Optional) ROAD WORK AHEAD

Figure A8 & A9: Lane Closure on a Two-Lane Road (Two Flagger Operation) & Lane Closure on a Four-Lane Undivided Road

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Figure A10 & A11: Lane Closure On Divided Roadway & Half Road Closure On Multi-Lane Roadway

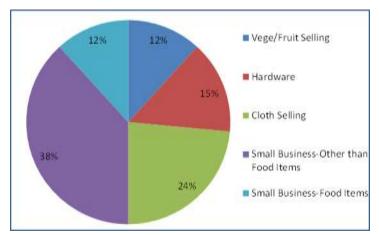


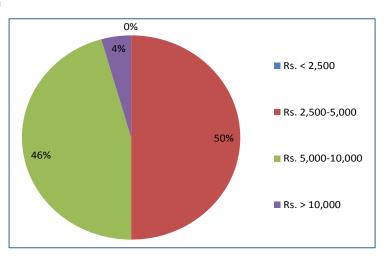


Appendix 11: Public Consultations Conducted During Project Preparation

A. Results of Socio-Economic Surveys Conducted in June-August 2013

- 1. Transect walks identified a total of 68 APs whose business will be temporarily affected during pipe laying, as they carry their activities within RoW. These businesses can be broadly classified into five main categories as: (i) vegetable/fruit selling; (ii) hardware selling; (iii) cloth selling; (iv) small business other than food items such as bangle selling, cobbler etc.; and (v) small businesses related to food items such as fast food selling. Close to 50 percent of these however are engaged in small businesses other than food items and hardware. Many of the surveyed businesses (80 percent) have movable structures while some APs sit on roads for selling their goods. An average cost of their business unit/structure was estimated atRs. 13,838 with minimum at Rs. 2,000 and maximum at Rs. 45,000.
- 2. Street vending is quite a common practice in commercial and mixed land use areas of Bhilwara and around 72 percent of the APs indicated that they are doing their business at present location for more than 10 years. An additional 16percent indicated that they have this fixed location for more than five years while the remaining 12 percent said they have moved in respective places in last 1-5 years.
- 3. In terms of the socio-economic background none of the APs earn income below poverty line (Rs. less than 2,500 per month). A majority of the households (50 percent) earn monthly income between Rs. 2,500-5,000 and belong to lower income class group. Average monthly income works out at Rs. 6.000 with minimum at Rs. 3.000 maximum Rs. and at 30.000. Considering work week of six days (26 days per month), average daily income is estimated at Rs. 231 for APs. This is certainly higher than daily minimum wages prescribed for the region for skilled labour at Rs.166.



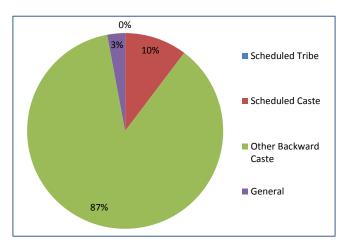


4. A majority of the APs (87%) belong to other backward classes while among the others are general category (3%); and scheduled castes (SCs-10%). There were no scheduled tribe (ST) APs and women headed households (WHH)¹ found during the survey. Total vulnerable²

¹ Household is considered women headed when she is the single bread earner of the family or earn most of the income for the family.

APs comprise 10 percent of the total surveyed APs. Average family size for surveyed APs was 6.1. All the surveyed APs were residents of Bhilwara living in the city for more than 5 years.

5. Transect walk data/analysis will be updated road wise where pipelines will be laid before mobilization of contractor and revised RP will be submitted to the ADB for approval³. A 100 percent census and socio-economic surveys will be undertaken to register and document the status of affected people (APs) within subproject impact area⁴.



Vulnerable households may include female-headed household, physically handicapped-headed household, scheduled tribe-headed households, Below Poverty Line households, and households with marginal land holdings, that is the only source of livelihood, and majority of that land is being acquired under the project.

³ It is suggested under this RUSDP that list of temporary APs should be separated from any APs which envisage permanent impacts. RPs should also include separate and clear sections on their socio-economic profile, impacts and entitlements.

During RP revision, census/socio-economic surveys for temporary impacts should include specific questions on place of business, its seasonal variation and AP's migrant nature. A separate list of such APs should be made to suggest that they may not be present at the same location during construction time/compensation. These APs however will be still entitled for compensation (if affected due to project). However, such list will tentatively indicate PMU/PIU/ADB the extent of missing APs during implementation. It is also suggested under this RUSDP that missing APs under temporary impacts not traceable for more than 18 months after the start of compensation disbursement, or do not claim their entitlement within project construction period, will bear no impacts of the project and hence will not be considered for compensation.

Appendix 12: Sample Monthly Reporting Format for Assistant Safeguards Officer/Assistant Construction Manager

1. Introduction

- Overall project description and objectives
- Description of sub-projects
- Environmental category of the sub-projects
- Details of site personnel and/or consultants responsible for environmental monitoring
- Overall project and sub-project progress and status

	Sub Project		Status o	list of	Brogress		
No.	Sub-Project Name	Design	Pre- Construction	Construction	Operational Phase	List of Works	Progress of Works

2. Compliance status with National/ State/ Local statutory environmental requirements

No.	Sub-Project Name	Statutory Environmental Requirements	Status of Compliance	Action Required

3. Compliance status with environmental loan covenants

No. (List schedule and paragraph number of Loan Agreement)	Covenant	Status of Compliance	Action Required

4. Compliance status with the environmental management and monitoring plan

- Provide the monitoring results as per the parameters outlined in the EMP. Append supporting documents where applicable, including Environmental Site Inspection Reports.
- There should be reporting on the following items which can be incorporated in the checklist
 of routine Environmental Site Inspection Report followed with a summary in the semi-annual
 report send to ADB. Visual assessment and review of relevant site documentation during
 routine site inspection needs to note and record the following:
 - What are the dust suppression techniques followed for site and if any dust was noted to escape the site boundaries;
 - If muddy water was escaping site boundaries or muddy tracks were seen on adjacent roads;
 - adequacy of type of erosion and sediment control measures installed on site, condition of erosion and sediment control measures including if these were intact following heavy rain;

- o Are their designated areas for concrete works, and refuelling;
- Are their spill kits on site and if there are site procedure for handling emergencies;
- o Is there any chemical stored on site and what is the storage condition?
- o Is there any dewatering activities if yes, where is the water being discharged;
- How are the stockpiles being managed;
- How is solid and liquid waste being handled on site;
- o Review of the complaint management system;
- Checking if there are any activities being under taken out of working hours and how that is being managed.

Summary Monitoring Table

		Table					
Impacts	Mitigation	Parameters	Method of	Location	Date of	Name of	
(List from	Measures	Monitored (As a	Monitoring	of	Monitoring	Person	
(IEE)	(List from	minimum those	J 11 3	Monitoring	Conducted	Who	
· <i>/</i>		identified in the IEE		Monitoring	Oonaactea		
	IEE)					Conducted	
		should be				the	
		monitored)				Monitoring	
Design Pha	se						
Pre-Constru	uction Phase						
Construction	n Phase						
Operational Phase							

Overall Compliance with CEMP/EMP

No.	Sub-Project Name	EMP/ CEMP Part of Contract Documents (Y/N)	CEMP/ EMP Being Implemented (Y/N)	Status of Implementation (Excellent/ Satisfactory/ Partially Satisfactory/ Below Satisfactory)	Action Proposed and Additional Measures Required

5. Approach and methodology for environmental monitoring of the project

 Brief description on the approach and methodology used for environmental monitoring of each sub-project

6. Monitoring of environmental impacts on project surroundings (ambient air, water quality and noise levels)

- Brief discussion on the basis for monitoring
- Indicate type and location of environmental parameters to be monitored
- Indicate the method of monitoring and equipment to be used
- Provide monitoring results and an analysis of results in relation to baseline data and statutory requirements

As a minimum the results should be presented as per the tables below.

Air Quality Results

Site No.	Date of Testing	Site Location	Parameters (Government Standards)		
			PM10 µg/m³	SO ₂ µg/m³	NO ₂ µg/m³

Site No.	Site No. Date of Testing Site Location		Parame	eters (Moni Results)	itoring
Site No.	Date of Testing	Site Location	PM10 µg/m³	SO₂ µg/m³	NO ₂ µg/m³

Water Quality Results

Water Quality Results								
			Parameters (Government Standards)					
Site No.	Date of Sampling	Site Location	рН	Conductivity	BOD	TSS	TN	TP
			-	μS/cm	mg/L	mg/L	mg/L	mg/L

			Parameters (Monitoring Results)					
Site No.	Date of Sampling	Site Location	рН	Conductivity	BOD		TN	TP
				μS/cm	mg/L	mg/L	mg/L	mg/L

Noise Quality Results

Cita Na	Site No. Date of Testing Site Location		LA _{eq} (dBA) (Government Standard)		
Site No.	Date of Testing	Site Location	Day Time	Night Time	

Site No.	Date of Testing	Site Location	ring Results)	
Site No.	Date of Testing	Site Location	Day Time	Night Time

7. Summary of key issues and remedial actions

• Summary of follow up time-bound actions to be taken within a set timeframe.

8. Appendixes

- Photos
- Summary of consultations
- Copies of environmental clearances and permits
- Sample of environmental site inspection report
- Other

APPENDIX 13: SAMPLE ENVIRONMENTAL SITE INSPECTION REPORT

Project Name			
Contract Number			
NIA N. 45	D.A.T.C.		
NAME:	DATE:	·	
TITLE:	DMA:		_
LOCATION:	GROU	IP:	
WEATHER:			
WEATHER.			
	Project	Survey	
	Activity	Design	
	Stage	Implementation	
		Pre-Commissioning	
		Guarantee Period	

Monitoring Items	Compliance
Compliance marked as Yes / No / Not applicable (NA) / Partially Implemented (PI)	Compliance
EHS supervisor appointed by contractor and available on site	
Construction site management plan (spoils, safety, schedule, equipment etc.,) prepared	
Traffic management plan prepared	
Dust is under control	
Excavated soil properly placed within minimum space	
Construction area is confined; no traffic/pedestrian entry observed	
Surplus soil/debris/waste is disposed without delay	
Construction material (sand/gravel/aggregate) brought to site as & when required only	
Tarpaulins used to cover sand & other loose material when transported by vehicles	
After unloading, wheels & undercarriage of vehicles cleaned prior to leaving the site	
No chance finds encountered during excavation	
Work is planned in consultation with traffic police	
Work is not being conducted during heavy traffic	
Work at a stretch is completed within a day (excavation, pipe laying & backfilling)	
Pipe trenches are not kept open unduly	
Road is not completely closed; work is conducted on edge; at least one line is kept open	
Road is closed; alternative route provided & public informed, information board provided	
Pedestrian access to houses is not blocked due to pipe laying	
Spaces left in between trenches for access	
Wooden planks/metal sheets provided across trench for pedestrian	
No public/unauthorized entry observed in work site	
Children safety measures (barricades, security) in place at works in residential areas	
Prior public information provided about the work, schedule and disturbances	
Caution/warning board provided on site	
Guards with red flag provided during work at busy roads	
Workers using appropriate PPE (boots, gloves, helmets, ear muffs etc)	
Workers conducting or near heavy noise work is provided with ear muffs	
Contractor is following standard & safe construction practices	
Deep excavation is conducted with land slip/protection measures	
First aid facilities are available on site and workers informed	
Drinking water provided at the site	

Monitoring Items	Compliance
Toilet facility provided at the site	
Separate toilet facility is provided for women workers	
Workers camps are maintained cleanly	
Adequate toilet & bath facilities provided	
Contractor employed local workers as far as possible	
Workers camp set up with the permission of PIU	
Adequate housing provided	
Sufficient water provided for drinking/washing/bath	
No noisy work is conducted in the nights	
Local people informed of noisy work	
No blasting activity conducted	
Pneumatic drills or other equipment creating vibration is not used near old/risky buildings	

Signature		
Sign off		
Name	 Name	
Position	Position	

Appendix 14: Sample Grievance Registration Form

(To be available in Hindi and English)									
The		Proi	ect welcomes compl	aints, sugges	stions, a	ueries.			
	rding	project implementation. We er							
		ation to enable us to get in touc							
		ude your personal details but							
		g/typing *(CONFIDENTIAL)* a				,			
Date		Place of registration	Project Town	Project Town					
		I							
			Project:	Project:					
Contact information	ı/perso	onal details		т					
Name			Gender	* Male	Age				
				* Female					
Home address			_						
Place									
Phone no.									
E-mail		· · · · · · · · · · · · · · · · · · ·	المالية المنام المالية	Lat vulcara	يرمط ا	\ -fa			
	on/cor	mment/question Please provid	le the details (who, v	vhat, wnere,	and now	v) or your			
grievance below:									
If included as attack	hment	/note/letter, please tick here:							
		each you for feedback or upda	te on vour comment	/grievance?					
Tiow do you want a	3 10 10	acit you for recapacit or apac	te on your common.	rgiic varioc.					
FOR OFFICIAL LIS	- 0NI	V							
FOR OFFICIAL US									
Registered by: (ival	me oi	official registering grievance)							
Mode of communic	ation.								
Note/letter									
E-mail									
Verbal/telephonic									
Reviewed by: (Names/positions of officials reviewing grievance)									
The first of the f									
Action taken:									
Whether action take	en dis	closed:	Yes						
			No						
Means of disclosure:									