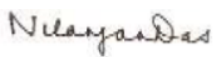







Final Environment and Social Due Diligence of Kandla International Container Terminal, Kandla, Gujarat

August 2021

Quality information

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Abbreviation

CAP	Environment Social Action Plan
CCA	Combined Consent Authorisation
CFS	Container Freight Stations
CISF	Central Industrials Security Force
CSR	Corporate Social Responsibility
DPT	Deendayal Port Trust
DWT	Dead Weight Tonnage
E&S	Environment and Social
EHSS	Environment Social Health Safety
ERP	Emergency Response Plan
ESA	Eco-Sensitive Area
ESDD	Environment Social Due Diligence
ESMP	Environment Social Management Plan
ESZ	Eco-Sensitive Zone
GHG	Greenhouse Gas
GPCB	Gujarat Pollution Control Board
HIRA	Hazard Identification and Risk Assessment
HR	Human Resource
HT	High Tension
HWA	Hazardous Waste Authorisation
ICTIPL	International Cargo Terminals and Infrastructure Private Limited
IFC	International Finance Corporation
IMDG	International Maritime Dangerous Goods
IOCL	Indian Oil Corporation Limited
ISO	International Organisation for Standardisation
ISPS	International Ship and Port Facility Security
ITV	Internal Transport Vehicle
KICT	Kandla International Cargo Limited
KLD	Kilo Litre Per Day
MoEF&CC	Ministry of Environment Forest and Climate Change
NOC	No-Objection Certificate
OT	Overtime
PESO	Petroleum and Explosives Safety Organization
POSH	Prevention of Sexual Harassment at the Workplace
PPE	Personal Protective Equipment
QHSE	Quality Health Safety and Environment
RCC	Reinforced Cement Concrete
RMQC	Rail Mount Quay Crane
RTGC	Rail Tyre Gantry Crane
SOLAS	Safety of Life at Sea

SPV	Special Purpose Vehicle
STP	Sewage Treatment Plant
TEUs	Twenty-Foot Equivalent Unit
USTs	Underground Storage Tanks
WBG	World Bank Group

1. Introduction

1.1 Background

Kandla International Container Terminal Private Limited (hereinafter referred to as 'Company' or 'KICT') is a special purpose vehicle (SPV) formed in February 2016 by J.M Baxi Group for the operation and maintenance of Berths 11 and 12 of the container terminal located within the boundaries of Deendayal Port Trust (hereinafter referred to as DPT - erstwhile Kandla Port Trust). A Concession Agreement was signed between DPT and KICT on 29th February 2016 to upgrade, operate and maintain two existing berths 11 and 12 for a period of 30 years.

Presently, the container handling capacity of KICT is 0.6 Million Twenty-foot Equivalent Unit (TEUs) per annum. KICT is planning to expand the existing handling capacity to 0.75 Million TEUs by installation of one Rail Mounted Quay Crane (RMQC) and four Electric Rubber Tyre Gantry Crane (eRTGC) and through the development of existing yard (entailing activities such as paving the surface, laying storm water drainage line, providing an access gate and installation of electrical poles and lighting). The additional equipment will reduce the time of loading and unloading of containers from ships. KICT is seeking an investment from the International Finance Corporation (IFC) for the purchase of additional equipment to meet the proposed expansion plan.

Prior to investment by IFC, Environment and Social Due Diligence (ESDD) is required to be conducted to assess the environmental and social risks associated with the KICT operation. For this, KICT has engaged AECOM India Private Limited (hereinafter referred to as 'AECOM') to undertake an ESDD for KICT operation against the applicable reference frameworks.

This report provides a gap assessment with respect to the applicable IFC E&S Performance Standards and Indian Statutory E&S regulations. The report highlights the key issues of E&S non-conformance along with Corrective Action Plan to address the identified gaps. The report is based on the review of data and documents made available by KICT and information obtained during site visit followed by multiple rounds of discussions with KICT officials, contractors' representatives and workers. A virtual site tour and discussion sessions were conducted from 31st May to 3rd June 2021 and physical site visit was conducted on 18th and 19th June 2021. The draft ESDD report was submitted to KICT and IFC and subsequent to series of discussions and amendments, this ESDD Report has been finalized on 9th August 2021.

1.2 Objectives of the Study

The main objectives of the Environmental and Social Due Diligence study are as follows:

1. To assess scope and adequacy of the Project's environmental, social, safety and human resources management systems, policies and resources in line with the national legal requirements and IFC Performance Standards.
2. To understand the relevant characteristics of the Project related to environmental, social, health, and safety ("ESHS") aspects based upon a review of existing information and site visit. Relevant characteristics would include project description; institutional and legal framework; environmental and social conditions; environmental, social, health and safety impacts and issues; mitigation and monitoring measures; health and safety procedures; contingency/emergency procedures; management review and management of contractors.
3. To evaluate the adequacy of the environmental, social, health, and safety assessment, plans and procedures and present conclusions and recommendations associated with identified deficiencies or issues. These are to include, but not limited to, impacts not identified or properly evaluated, impacts not properly mitigated, insufficient monitoring programs, potential environmental risks and liabilities, etc.
4. To determine the IFC's Environmental and Social Performance Standards applicable to the Project and identify gaps with respect to compliance with Performance Standards.
5. To develop Corrective Action Plan (CAP), recommending appropriate actions required to close the gaps identified and ensure compliance with IFC Performance Standards.

1.3 Scope of Work

The broad scope of work for the assignment is given below.

- An evaluation of the status of compliance of the Project and associated facilities, with applicable host country and IFC PS requirements related to environment, social, health and safety
- Review of the Project's Environment Management Plan (EMP), EHS plans and policies, occupational health and safety arrangements and other procedures and plans relative to the reference framework including Contractor and Stakeholder Management.

- An evaluation of the adequacy of environmental and social mitigation measures and monitoring procedures for the Project
- Review the adequacy of existing measures to address the environmental and social standards and statutory compliance requirements and associated budgetary allocations.
- An evaluation of the Company's labour policies and practices and their implementation for the Project.
- Review of existing contractor's experience and capabilities to comply with E&S requirements, and if available adequacy of Contractor's ESMP.
- Undertake consultations with KICT employees, contractors, workers and local communities if any.
- Development of Corrective Action Plan (CAP) to address any gaps with compliance as identified through the ESDD.

1.4 Reference Framework

- International Finance Corporation (IFC) Sustainability Framework and Performance Standards, 2012.
- World Bank Group/IFC Environment Health and Safety (EHS) Guidelines, 30th April 2007
- IFC Performance Standards and Guidance Notes - 2012 Edition; GN6 edition of June 2019
- IFC EHS Guideline for Ports, Harbors and Terminals, February 2017
- Applicable national and regional E&S legislation.
- International Labour Organization (ILO) Conventions ratified by India.

1.5 Approach and Methodology

The key activities undertaken for the ESDD study have been described in Figure 1.

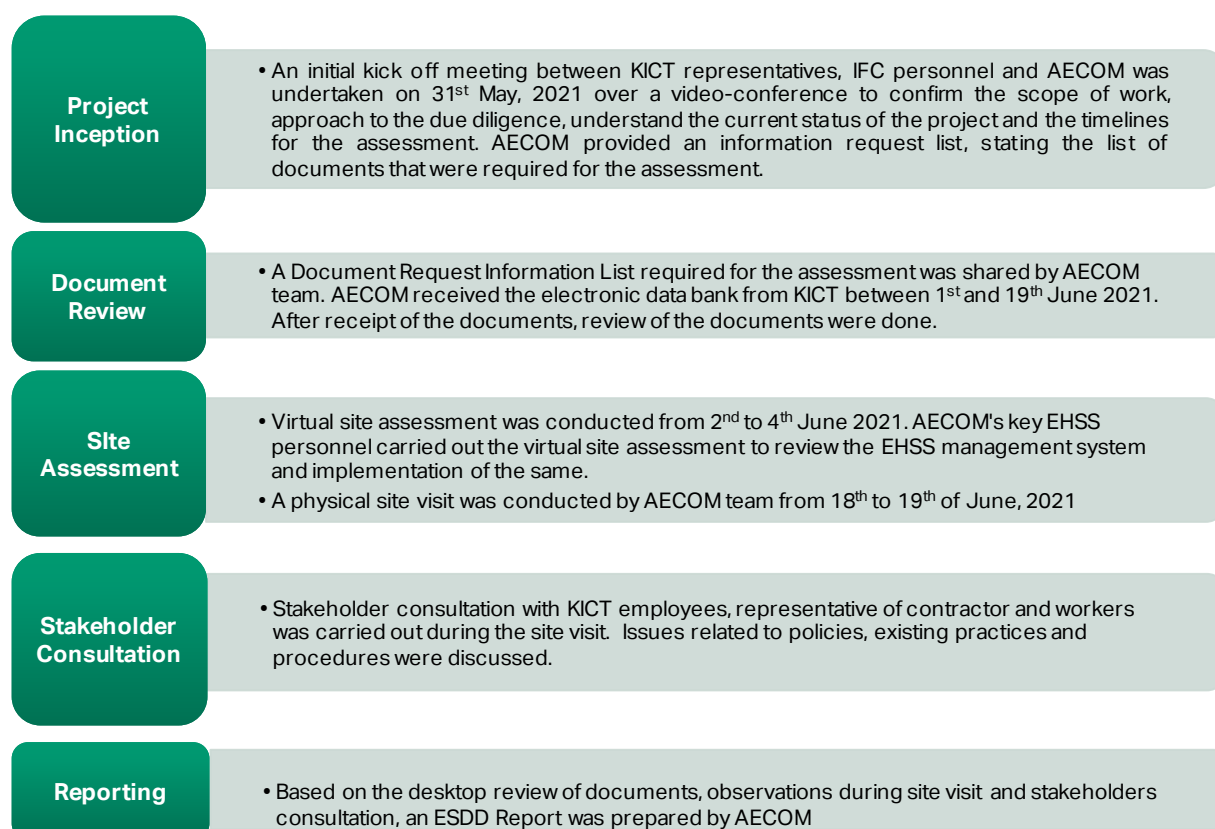


Figure 1 Summary of the Approach & Methodology

1.5.1 Kick-Off Meeting

An initial kick-off meeting between KICT representatives, IFC personnel and AECOM was undertaken on 31st May, 2021 over a video-conference to confirm the scope of work, approach to the due diligence study, understand the current status of the project and the timelines for the assessment. AECOM listed the applicable EHS and social documentation that were required to be reviewed and shared with KICT.

1.5.2 Document Review

AECOM received the electronic data bank from KICT between 1st June and 19th June 2021. The relevant project documents pertaining to the EHS and Social performance were reviewed. This was aimed at understanding the ongoing implementation process, record maintenance, internal monitoring and reporting. The mandatory regulatory compliances required for the project was also reviewed. The key documents reviewed during the study are provided in **Appendix I**.

1.5.3 Site Visit and Physical Verification

Virtual site assessments were conducted from 2nd to 4th June 2021. AECOM's key EHSS personnel carried out the virtual site assessment to review the implementation of the EHSS management. In addition, a physical site visit was conducted by AECOM team from 18th to 19th June 2021 to understand the site operation, working conditions, OHS implementation and physical inspection of the terminal and its utilities. The site visit covered the terminal and the associated utilities such as storage areas for hazardous wastes, fire-fighting facilities, security systems, DG sets, Sewage Treatment Plants, diesel storage facility and amenities provided for workers.

1.5.4 Stakeholder Consultation/Interview

Stakeholder consultation with site management, departmental heads (EHS, HR, Electrical, Security), representative of contractors and contract workers was carried out as part of the assessment. Discussions were held separately with representatives and workers of KICT's contractors including Mas Marine, Sailani & Co, A.P Logistics and Z-plus. Both virtual and physical interaction was carried out with the different categories of stakeholders. The list of stakeholders consulted and interviewed during the physical and virtual site visits are provided in **Appendix II**.

1.6 Reporting

Information collected from document review, stakeholder consultation and direct observations made by AECOM have been collated and compared against the reference frameworks to generate findings for the report. A preliminary report containing initial findings and observations was prepared based on the document review and virtual site assessment.

A detailed ESDD report was developed post the physical site visit and based on the review of documents shared by KICT. The ESDD report details out the findings, compliance status, gaps and recommendation. A Corrective Action Plan has been developed as part of the ESDD report for addressal and closure of identified gaps with suggested timelines.

1.7 Limitations

Wherever AECOM has not been able to make a judgment or assess any process, it is highlighted as an information gap and a way forward is suggested.

AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by the Company representative or employees at the time of assessment.

Information provided in this report cannot be construed as legal advice.

2. Project Description

2.1 About KICT

Kandla International Container Terminal (Private) Limited (KICT) is one of the flagship container terminals of J M Baxi Group and is a Special Purpose Vehicle (SPV) formed in February 2016. It is a 100% subsidiary of International Cargo Terminals and Infrastructure Private Limited (ICTIPL), which is part of the J.M. Baxi Group. The Concession Agreement for the terminal was signed on 29th February 2016 between Deendayal Port Trust and KICT to upgrade, operate and maintain Berth Nos 11 and 12 for handling of dry cargo. The site was handed over to KICT on September 2016 along with container handling equipment. Refurbishment work such as construction of terminal building, laying of road paver in the whole area, etc was carried out by KICT. The terminal received the Commercial Operation Date on 28th January 2017. The chronology of events for Berths 11 and 12 based on the information received from KICT is provided below:

Year	Activity
1931	Kandla port started functioning with one pier
1952	Foundation stone for construction of new Kandla Port
1955	Kandla Port declared as a Major Port
1963	DPT (erstwhile Kandla Port Trust) was created
1965	Land was handed over to DPT
2003-2004	Construction period related to berth 11 and 12 started
2006-2016	Berth 11 and 12 under ABG as concessionaire
2016	Berth 11 and 12 handed over to KICT
2017 to date	The berths are under KICT operation

Kandla Port is the closest terminal to the western and the northern hinterlands of the country due to its unique positioning on Kandla Creek in the Gulf of Kutch. It is located near to Kandla Special Economic Zone and other industrial clusters of Gujarat. Kandla is a tidal port, having an average tidal range of 6 meters. The tide timings advance on an average by 52 mins each day. As a practice, KICT berths the vessels on the starboard side, so that big vessels with deep draught could sail out to sea on the rising tide. For a vessel to berth, it should arrive two hours prior to high tide timings. The layout map of the KICT area is provided in **Figure 2**.

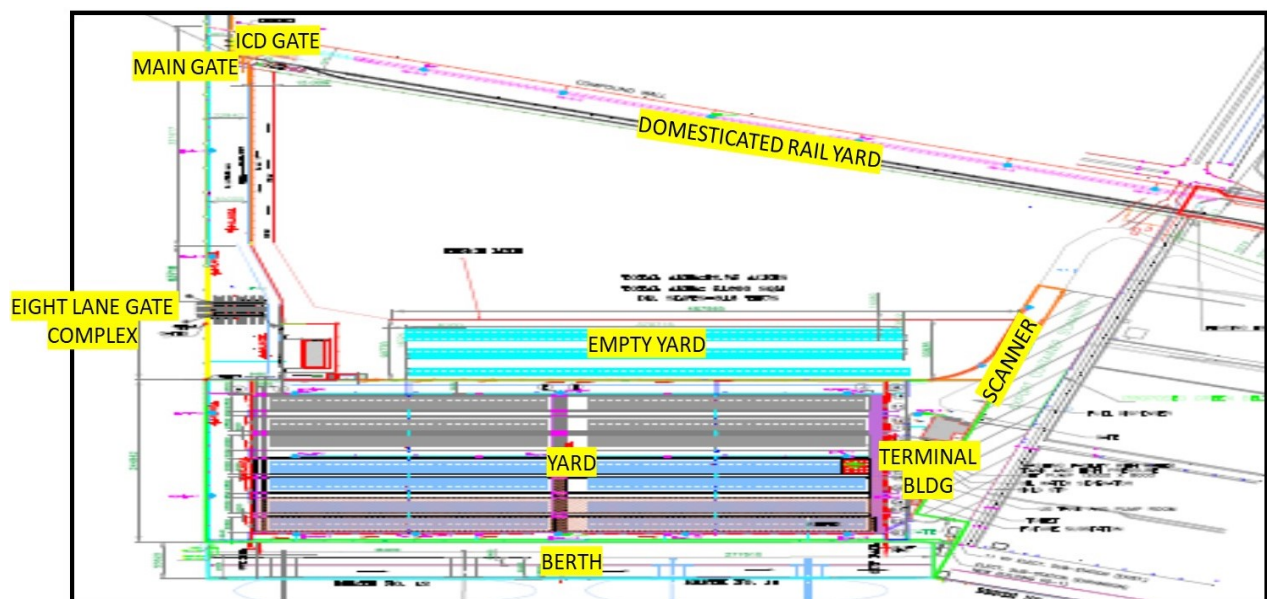


Figure 2 Layout Map of the KICT area

2.2 Expansion Plan

The present container handling capacity of KICT is 0.6 million TEUs per annum. The proposed expansion aims to augment the existing capacity from 0.6 million TEUs to 0.75 million TEUs. KICT is also planning to obtain 51,600 sq.m of empty land on lease from DPT for stacking of empty containers. This area will involve development activities comprising paving of surface, construction of storm water drains, installation of lighting poles and cable trenches.

The details of present and proposed equipment/facilities for the project is given in Table 2-1

Table 2-1: Existing and Proposed Equipment Details

SI No	Equipment	Existing	Proposed	Total
1	Rail Mounted Quay Crane (RMQC)	4	1	5
2	Rubber Tyre Gantry Crane (RTGC)	4	-	4
3	Electric Rubber Tyre Gantry Crane (eRTGC)	-	4	4
4	Internal Transport Vehicles (ITV)	30*	7	37
5	External Container Trucks (per day)	1000-1200	300-400	1300-1600

*Only 28 ITVs are presently operational

2.3 Location and Accessibility

KICT Terminal is located in DPT premises on the west coast of India and is one of the major ports in the state of Gujarat. The Port was declared as a Major Port on April 8, 1955. The port is situated at latitude 23°01'N and longitude 70°13'E on the shores of Kandla Creek in the Gulf of Kutch, 90 nautical miles from the Arabian Sea. The Port is well connected by roads and rail network and provides a gateway for export and import to North Indian states of Jammu & Kashmir, Delhi, Punjab, Himachal Pradesh, Haryana, Rajasthan, Gujarat and parts of Madhya Pradesh, Uttaranchal and Uttar Pradesh. The nearest Railway Station is Gandhidham and the nearest airport is located at Bhuj (for domestic) and Ahmedabad (for domestic and international). The project location map is provided in **Figure 3** and accessibility map in **Figure 4**.

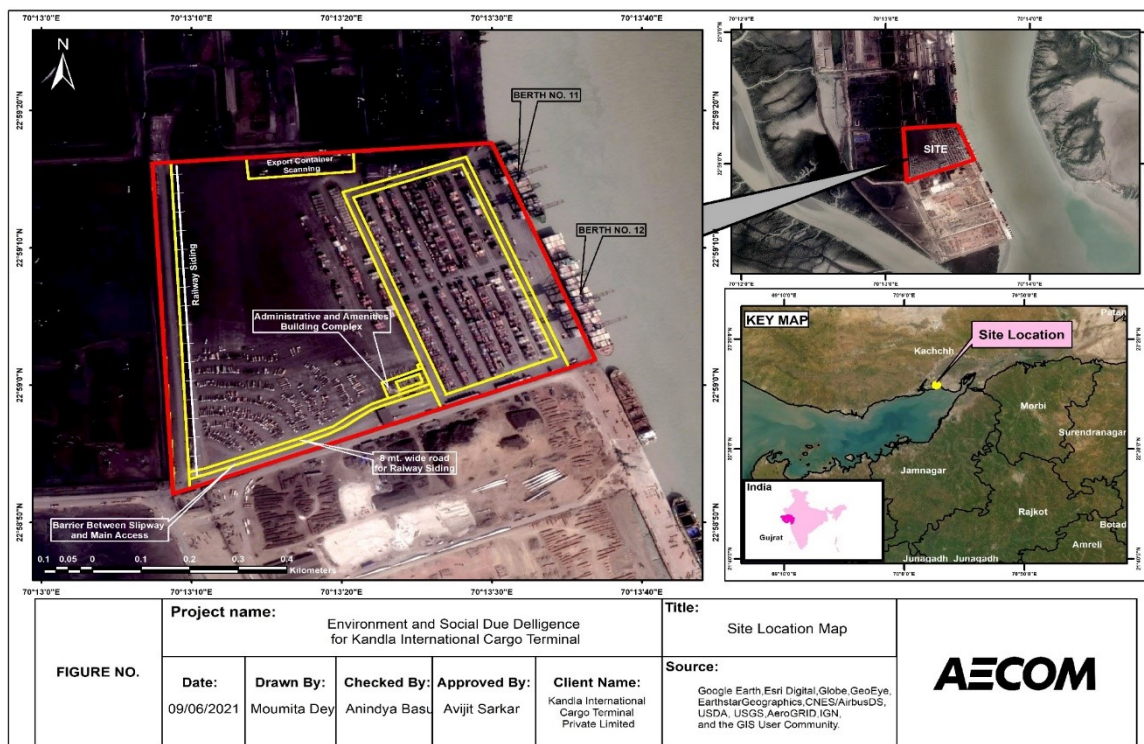


Figure 3 Location of KICT

2.4 Environmental Settings

KICT is located within the Deendayal Port Trust complex, where a total of 16 berths including Berth 11 and 12 are in operation. The KICT Terminal (Berths 11 & 12) is surrounded by the following:

- **North:** Berth 10 of Deendayal Port Trust
- **East:** Kandla Creek, Arabian Sea
- **West:** Stockyard and road towards Gandhidham.
- **South:** Berth 13 of Deendayal Port Trust.

The topography at the site location is flat with elevation from sea level to 3m MSL. There is no stream or nala passing through the project site. The entire area has a slope towards the creek.¹ There are no Protected Areas (PA) including National Parks and Wildlife Sanctuaries etc. located within 10 km of the project boundary. Further, there are no Eco-Sensitive Zone (ESZ) or Eco-Sensitive Area (ESA) notified by the Ministry of Environment, Forest and Climate Change (MoEF&CC) within the 10 km radius.

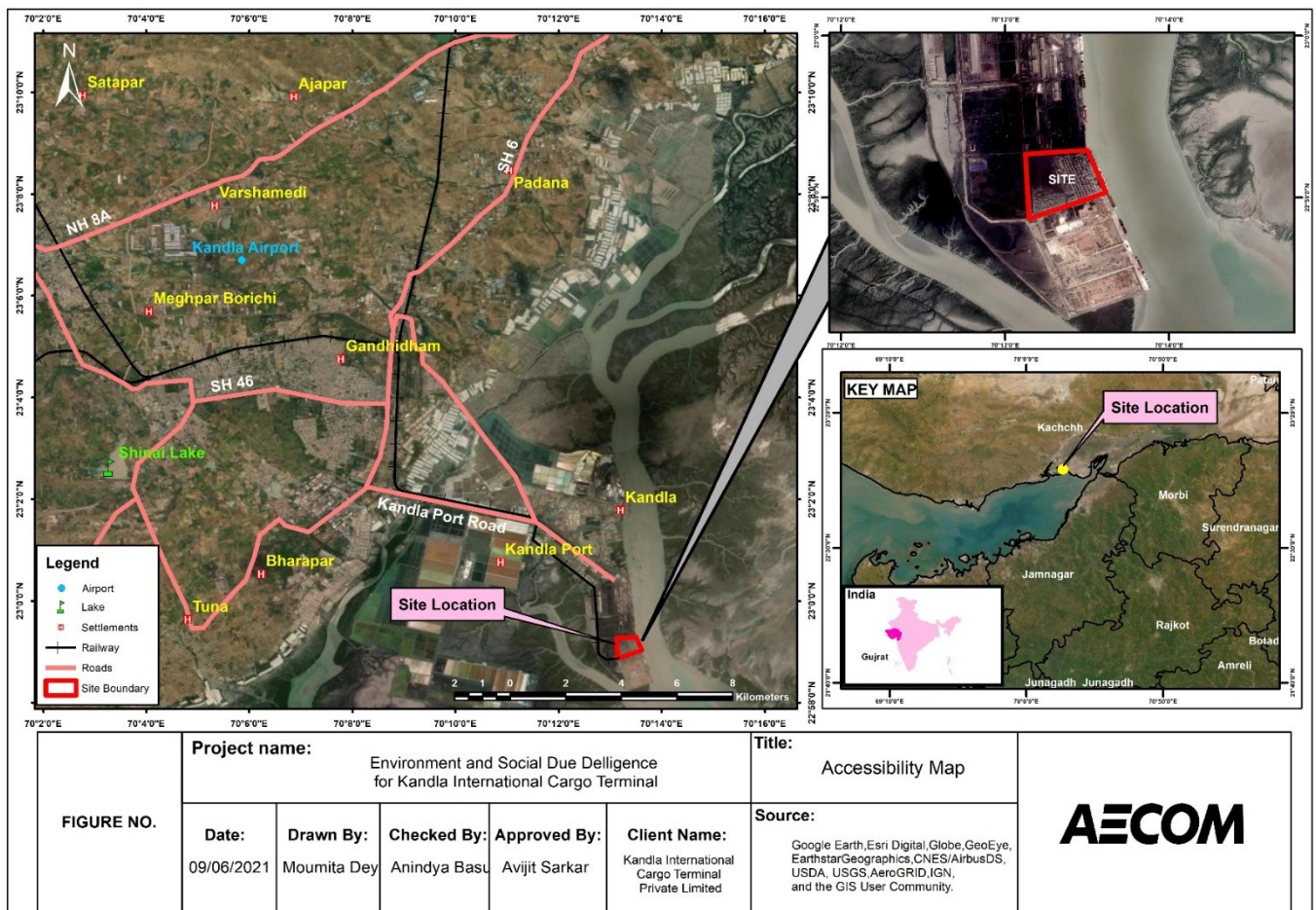


Figure 4 Accessibility Map of KICT

2.5 Project Operation

The present land area for KICT includes container yard area (150000 Sqm), rail line and allied area for pre-stacking of ICD container (37400 Sqm) and area for Berths 11 and 12 (30034 Sqm).² The terminal presently has 4 RMQCs, 4 RTGCs, 6 Reach stackers, 2 Forklifts, and 2688 ground slots including 48 reefers plug points. The terminal has a draft of 13 meters that can accommodate 65,000 DWT vessels. There is also a dedicated railway siding to the container terminal for facilitating transportation of rail-borne cargo. All maintenance dredging activities including disposal of dredged material are responsibility of DPT. The existing KICT infrastructure is provided in Table 2-2.

¹ Master Plan for Kandla Port, Ministry of Shipping/Indian Port Association, 2016

² Source: Concession Agreement, dated 29th February 2016

Table 2-2: KICT Infrastructure

	Name of The Port	Deendayal Port Trust
	Name of The Terminal	Kandla International Container Terminal Pvt. Ltd.
Wharf Details	No. of Berth	2 Nos (11 th and 12 th)
	Length of Wharf	545 meters
	Dredged Depth	14.1 meter
	Min Under Keel Clearance Required at Berth	1.2 meter
	Max Deadweight Tonnage of the ship	65000 Tons
	Tidal Range	Varies Between 5 to 6 meters as per Tide Table
	Terminal Operation Hours	24 X 7
Marine Details	Channel Length	22 Km (11.9 NM)
	Channel Width	350 meters
	Channel Depth	14.0 meter with Tide
	Steaming Time OTB to Berth No 11&12	1.5 Hrs.
	Min. UKC Required in Channel	1 meter
	Turning Basin Diameter	No Turning Basin
	Width in the creek abreast of the Berth	Varies Between 700 meters to 900 meters.
	Tugs	8 Nos
	Bollard Pull of Tugs	3 Tugs - 35 Tons, 3 Tugs - 50 Tons, 2 Tugs - 65 Tons
	Max LOA Permitted	330 Meters
	Restriction for Night Navigation	Max Draft 13 Meter
Yard & Gate Details	Ground Slots	3488
	Reefer Plugs	48
	Number of Gate Lanes	8 Gates (4 In/4 Out)
	Weighbridge	100 Tons capacity

Source: KICT Electronic Data Bank, Dated 01.06.2021

KICT terminal has been developed to handle both inwards and outwards traffic. As reported, the major types of cargo handled comprises both agriculture and non-agriculture goods. About 85% of the export commodity is rice and wheat, 7% ceramic tiles and remaining 8% are chemicals (IMDG Code Class 9)³, sugar, salt, coke, and other general cargo. About 49% of the import commodity are general metal scraps, followed by 19% white spirit, and 17% oil products. Other commodities imported are food products, bitumen, general cargo, timber and glass (3% each). The operation of the port is limited to just handling of containers and there are no activities related to packing or unpacking of containers. There is a separate container space designated for storage of chemicals and hazardous materials.

As reported by KICT, the monthly volumes were registered at 166 TEUs in January 2017 and 1536 TEUs in February 2017 (during initial operations by KICT). The yearly volume of container handled by KICT is provided in Table 2-3 below

Table 2-3: Yearly Volume of Containers and Vessels Handled by KICT

Year	# Containers	Increased capacity of container handled in %	# Vessels
2016-17	5252	-	11
2017-18	117224	4.5%	146
2018-19	244371	47%	247
2019-20	446907	54%	372
2020-21	514844	86%	428
Total	1328598		2408

Source: Information shared by KICT, Dated 01.06.2021

³ The International Maritime Dangerous Goods Code has been developed as an international code for maritime transport of dangerous goods in packaged form, in order to enhance safe carriage of dangerous goods and to prevent pollution to the environment. The Code sets out in details the requirements applicable to each individual substance, materials or articles, covering matters such as packing, container traffic and stowage. There are 9 dangerous goods classes. Substances (including substances and mixtures), and articles are assigned to one of the 9 classes according to the most predominant hazards they pose in transport. IMDG Code Class 9 include substances/materials such as zinc oxide, lithium cells, air bag modules and motor engines.

From the above table, it can be seen that KICT has handled 1,328,598 TEUs since 2016-17. It is also evident that there has been a considerable growth in the volume of cargo handled by KICT.

In the case of vessels, KICT has handled a total of 2408 vessel since initiation of operation. As per the data above, the number of vessels handled per month has also increased. About 20 vessels were handled in a month in the FY 2018-19, which has increased to 35 vessel in FY 2020-21. In the financial year 2021-22, KICT handled 60 vessels as of 29th May 2021.

Regarding traffic movement, daily movement of trucks in KICT were reported to be 1000-1200 per day. In addition, 30 internal transport vehicles (ITVs) are operated inside the Terminal for 24 hours. It is proposed that 7 more ITVs will be added to the fleet after expansion. The terminal has parking space for 250 trucks/trailers. From the entry and exit records of the trucks, it was found that the average turnaround time for each truck is about 100 minutes.

The traffic movement handled by the port has shown a consistent increase and is growing at a fast pace. With a view to improve the delivery of the services, KICT aims at augmenting the existing capacity of Berths 11 and 12 from its current annual capacity of 0.6 million TEUs to 0.75 million TEUs. There will be addition of more equipment i.e. one RMQC and four eRTGC, which will be procured as part of the expansion. KICT is also planning to obtain 51,600 Sq.m land on lease from DPT for stacking of empty containers. This area will involve development activities comprising paving of surface, construction of storm water drains, installation of lighting poles and cable trenches.

Figures 5 and 6 provide details on the containerized cargo traffic in KICT over the last few years.

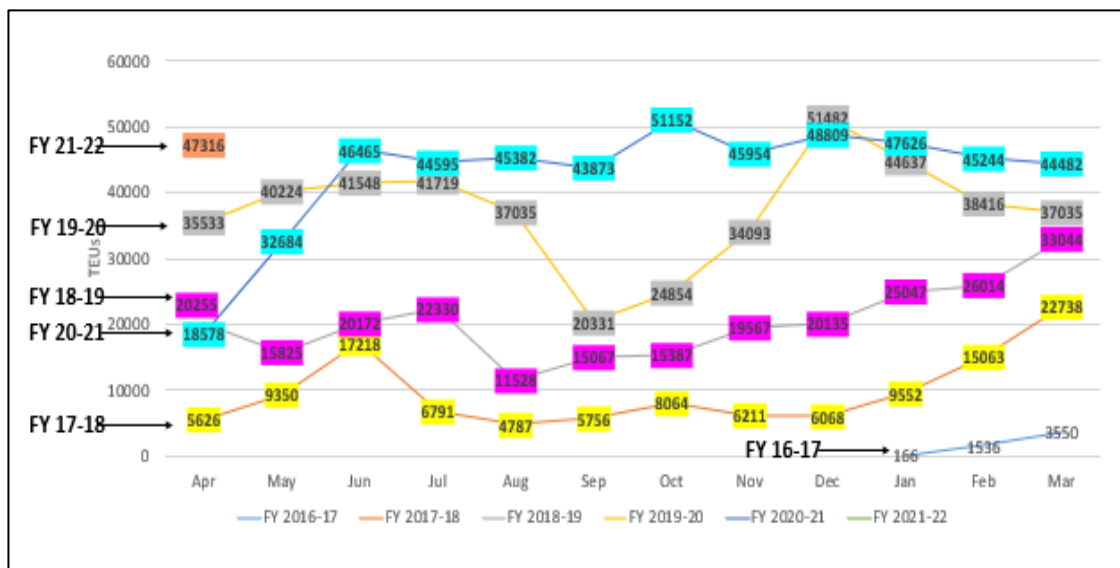


Figure 5 Monthly Volumes in Twenty-foot Equivalent Unit

Source: Information shared by KICT Dated 01.06.2021

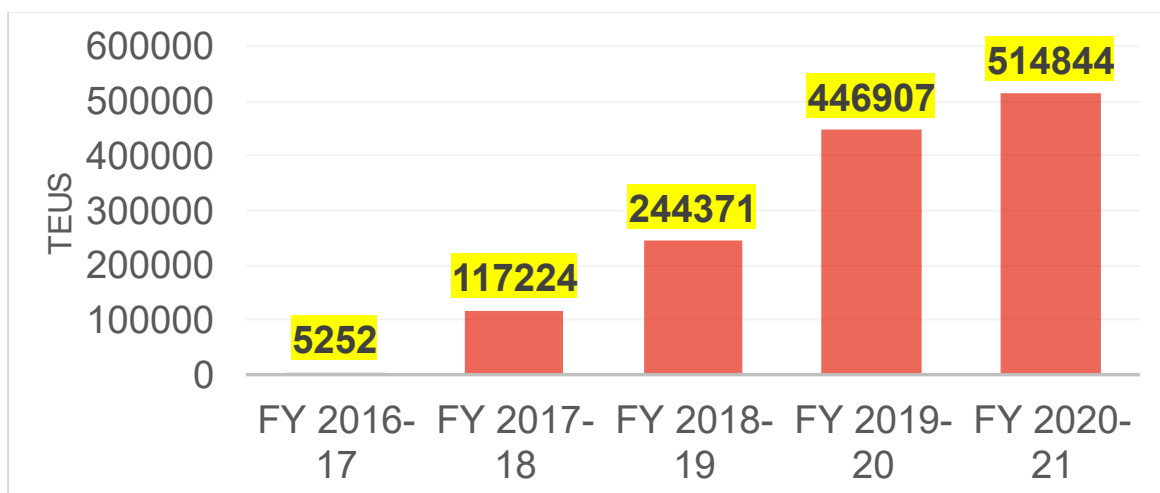


Figure 6 Yearly Volumes in Twenty-foot Equivalent Unit

Source: Information shared by KICT, Dated 01.06.2021

2.6 Utilities

The key utilities available at the KICT Terminal facility are as provided in Table 2-4.

Table 2-4: Details of Utilities

Utilities	Description
D.G. Sets	2 D.G Sets of of 625 kV and 1250 kV
Sewage Treatment Plants	2 STPs (5 KLD and 10 KLD) capacity
Transformers	One 11 KV HT Line
First Aid Centre	1 No
Canteen	2 Nos
Fuel Dispenser and Storage Tank	1 fuel dispenser with 2 underground storage tanks (UST), each of 20 KL capacity
Sub-station	1 No

Source: AECOM Virtual and Physical Site Visit.

2.7 Details of Resource Requirement

2.7.1 Land

The KICT terminal is located within the DPT premises. As per the concession agreement, the land area handed over to KICT for container yard is 150000 Sqm, Railway line and allied area for pre-stacking of ICD container is 37400 Sqm, and land area for Berths 11 and 12 is 30034 Sqm. The land belongs to Deendayal Port Trust and land procurement was done by DPT in 1965. KICT is also planning to obtain 51,600 sq.m land on lease from DPT for stacking of empty containers.

2.7.2 Workforce

KICT has a total workforce of 457 of which 187 are direct employees of KICT and 269 are contractual workers engaged by KICT for the project. The workers are working shift wise i.e. day shift, night shift, and general shift. The day and night shifts are of 12 hours duration each while the general shift is for 9 hours. The workforce details are provided in Table 2.5 below.

Table 2-5: Workforce Details

Employer	Type of Worker	Specialization	Total	Male	Female
1 KICT Employee	Direct		187	175	12
2 MAS Marine	Contractual	Checkers / Surveyors	66	66	0
3 Sailani & Co.		Lashers	60	60	0
4 Saurashtra Freight		Supply of Forklift	12	12	0
5 Arya Logistics		Supply of Reach Stacker	16	16	0
6 Lift & Shift		Supply of Reach Stacker	6	6	0
7 Stuti Hospitality Services		Manpower	2	1	1
8 Aarcellor Staffing		Janitors, Pantry boys, Ambulance Drivers, Drivers	11	11	0
9 Aarcellor Staffing		Painters & STP operator	4	4	0
10 A P Logistics		External Housekeeping, Utility Vehicle Drivers	21	21	0
11 A P Logistics		Fire guard / fuel bowser driver / sweeper	4	4	0
12 Z-Plus - Traffic Marshalls/ Security		Security Service	58	57	1
13 Shri Sai		Civil / Rail Yard /painter	5	5	0
14 Kemar Port Automation		FMS Engineer	3	3	0
15 M/s Shalom		Para Medical Staff	2	2	0
Total			457	444	13

The additional manpower requirements after capacity augmentation has been estimated as 50, of which 32 will be KICT employees and 18 contract workers. The details are provided in Table 2-6.

Table 2-6: Additional Manpower Requirements

Sr. No.	Department	Functions/Sub-Functions	Nos. of Employees Required
KICT Employees			
1	Operations	RTG Operators	18
		QC Operators	3
2	Engineering	Mechanical Technicians	3
		Electrical Technicians	3
		Mechanical Engineer	1
		Electrical Engineers	2
		Trainee-Mechanical	1
		Trainee-Electrical	1
Additional KICT Employees			32
Contract Workers			
1	Operations	Checkers	6
		Lashers	10
2	Engineering	Welder	1
3	QHSE	Safety Supervisor	1
Additional Contract Workers			18

KICT has obtained the Principal Employer Registration certificate bearing No. ALC/ADP/46R (06)/2016. The registration has been issued on 15th November 2016. The contractors engaged by KICT have obtained labour license as per the Contractor Labour and Regulation Act. Details of the labour licenses of various contractors have been provided in Table 3-1.

2.7.3 Water

The water requirement in KICT is mainly for domestic usage. The total water requirement for the daily operation of the terminal is reported to be around 52 KLD. The site has no borewell and water is mainly sourced through a piped water supply from DPT. In case of emergencies such as maintenance of the water supply system, private tankers supply water from Gandhidham are sourced. The drinking water requirement is met from packaged water which is obtained from Gandhidham.

The terminal has two STPs with capacity of 5KLD and 10 KLD. The 5 KLD STP is currently operational, and the 10 KLD STP is kept as a standby for the new administration building which is still under construction. Presently approximately 4 KLD of treated wastewater is generated from the STP and utilized for gardening purposes. The 5 KLD STP has a collecting chamber with 7 KL capacity for storing the wastewater. The maximum sludge generated per day is 2 kg. The sludge is kept in a designated open space and handed over to the Municipal authority for disposal.

2.7.4 Power

The major power source is a 11 kV HT Line from grid supply. Apart from that, two emergency DG sets of 625 kV and 1250 kV are present within KICT premises as a standby. There are 4 Nos. 11 KV outgoing feeders in HT sub-station which supplies power to the RMQCs.

2.7.5 Fuel

Diesel is stored within the terminal for refuelling of ITVs, other vehicles, machineries and DG sets. There are 2 underground storage tanks (UST), each of 20 KL capacity and a fuel dispenser unit, which has been installed by IOCL at a dedicated fuel storage area. Maintenance of the fuel dispensing unit is also done by IOCL. KICT has a valid PESO license (Licence No. P/WC/GJ/14/6666(P430281) with validity till 31st December 2030. During site assessment, it was observed that the storage area has flooring of paver blocks and stains were observed on paver blocks over approximately 15 sq.mt area. Reportedly, the USTs have RCC double chamber which was installed about 2 years back. Hence, the requirement of the integrity test has not yet arisen. Reportedly, soil and groundwater studies were undertaken prior to the installation of USTs by IOCL.

2.8 EHS Management and Organisational Structure

KICT operation is headed by the Terminal Head and is supported by a functional team consisting of Sr. General Manager- Operations, Sr. General Manager - Engineering, Deputy General Manager - QHSE, Assistant General Manager - HR, Assistant Manager - Security and Manager-Finance and Accounts and Information Technology. There is an EHS Manager at the corporate level who is responsible for all the terminals of ICTIPL.

KICT has also developed an QHSE Manual which specifies roles and responsibilities of personnel related to environment and safety. In KICT, the QHSE Head is responsible for overseeing the overall E&S Management and is assisted by 4 Executive (QHSE), one Jr. Executive (QHSE) and one trainee. Figure 7 depicts the organisational structure of KICT.

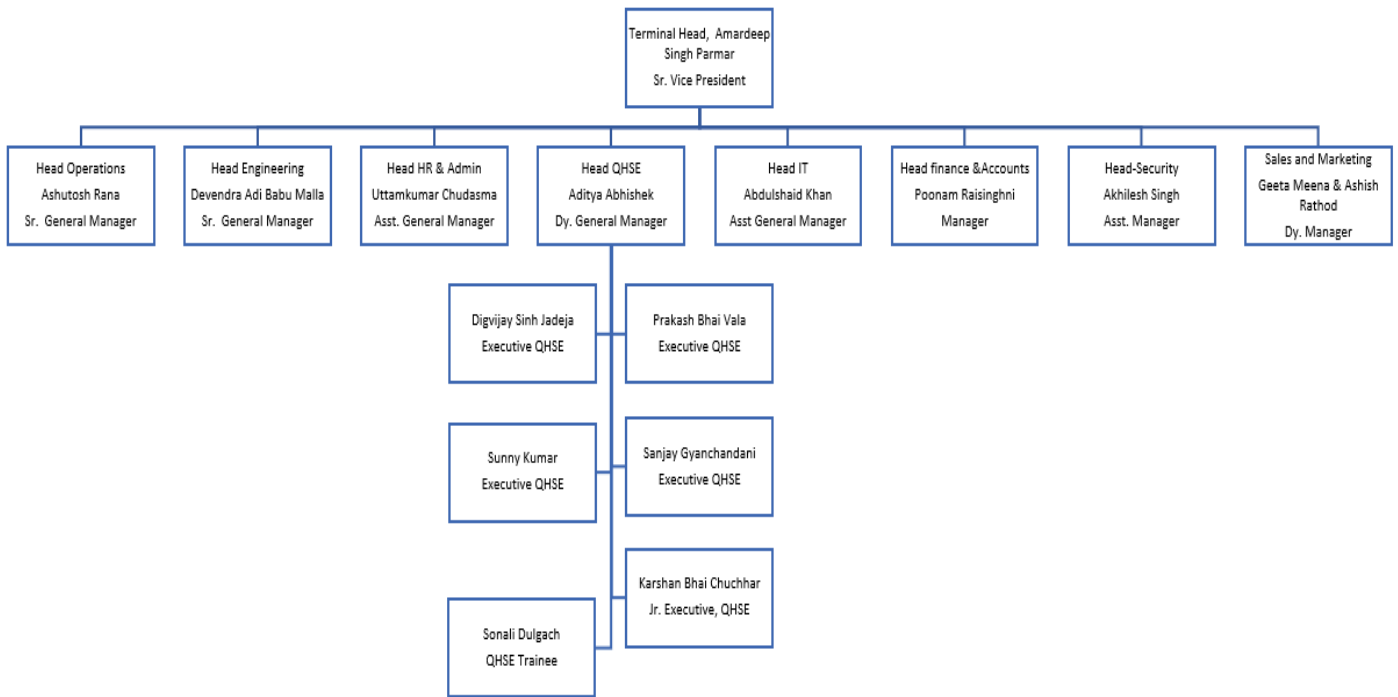


Figure 7: Organisational Structure of KICT

3. Applicable EHS and Social Framework

3.1 Applicable Regulatory Clearance and Permits

The status of applicable regulatory Environmental, Health, Safety and Social permits and licenses for KICT terminal are outlined in Table 3-1. This is based on the site assessment and subsequent review of the information shared with AECOM.

Table 3-1 Applicable Clearance and Permits

S. No	Permit Name	Issuing Authority	Status
1	Environmental Clearance	Ministry of Environment, Forest and Climate Change (MoEF&CC), Government of India (GoI)	<p>Environmental Clearance (EC No: J-17011/11/2003-IA-III) dated 3 August 2004 was issued to DPT (erstwhile Kandla Port Trust) for the 10th Cargo berth (renamed as 12th Cargo berth) which is available with KICT. However, the EC for the present 11th cargo berth was not made available for review although it was informed by KICT that the same was issued and available with DPT.</p> <p>As per EIA Notification 2006, EC is also applicable for capacity augmentation. But as the separate approved cargo handling capacity of Berths 11 and 12 is not available with AECOM, any conclusive remarks on requirement of EC for capacity augmentation cannot be drawn. KICT is recommended to submit an official query to DPT to understand if EC will be triggered for the proposed capacity augmentation, or the same is already covered under the existing EC. The communication should also include request to DPT to obtain the required EC if the same is deemed triggered.</p>
2	CRZ Clearance	Ministry of Environment, Forest and Climate Change (MoEF&CC), Government of India (GoI)	As reported by KICT, DPT had obtained CRZ clearance for the entire dry cargo handling Berths in DPT complex. However, the document was not made available for review.
3	Combined Consent and Authorisation (CCA)	Gujarat Pollution Control Board (GPCB)	DPT has renewed its Consolidated Consent and Authorization (CCA) from Gujarat Pollution Control Board (GPCB) (vide letter no. AWH-110594 dated 08/12/2020) with validity till 21 st July 2025. This CCA includes handling of dry cargo of capacity 26,54,00,000 Tons/Month (which also includes capacity of Berths 11 and 12). Separate cargo handling capacity for Berths 11 and 12 is not available in the CCA. Reportedly, the plan for augmentation of the existing cargo handling capacity in Berth 11 and 12 has not been initiated and application for capacity augmentation will be made once it is finalized.
4	Hazardous Waste Authorisation	Gujarat Pollution Control Board (GPCB)	<p>DPT has obtained the authorisation for handling, storage, transportation, and disposal of hazardous waste from GPCB (vide letter no. AWH-110594 dated 08/12/2020) and it is valid till 21st July 2025. The permissible limit for generation, storage and handling of Used Oil (Schedule 1-5.1) is 1125 MT and Waste Residue Containing Oil is 3344.43 MT (Schedule 1-5.2).</p> <p>The Hazardous waste disposal for KICT is carried through M/s Shil Lubricant, Surat, Gujarat who is authorised to undertake such activity through a CCA vide Consent order No. AWH-104123 and with validity till 30th June 2024. DPT also maintains Hazardous Waste manifest in Form 10 and submits annual return in Form IV to GPCB.</p>
5	License for the Storage of Diesel	Joint Chief Controller of Explosive, Mumbai	The facility has obtained license for the storage of 40.00 KL (Class B petroleum in bulk) diesel from the Deputy Chief Controller of Explosive, Mumbai. The validity of the license is till 31 st December 2030

S. No	Permit Name	Issuing Authority	Status
6	PESO License	Petroleum and Explosives Safety Organisation	Diesel is stored within the terminal for refuelling of ITV, other machineries and DG sets. 2 underground storage tanks each with 20 KL capacity and a fuel dispenser unit has been installed and maintained at the site by IOCL. KICT has a valid PESO licence (Licence No. P/WC/GJ/ 14/6666(P430281) with validity till 31st December 2030.
7	Dock Safety Certification	Inspectorate Dock Safety, Kandla Port	KICT has obtained Safety Certificate regarding the security check of the terminal vide letter no. 6/2/2012-13/G.S. N/554 dated 4 th January 2018 from the Assistant Director (Safety), Inspectorate Dock Safety, Kandla.
8	Fire No Objection Certificate (NOC)	Gujarat State Fire Prevention Services, Gandhidham	A Fire Safety Certificate under Form B13 of Sub-rule (1) of Rule 23 of the Gujarat Fire and Life Safety Regulation, 2016 has been obtained on 20th August .2020. The premises have been dedared safe and fit for occupancy for the period of 20th August 2020 to 19th August 2021.
9	Principal Employer's Registration under Contract Labour (Regulation and Abolition) Act, 1970	Labour and Employment Department, Government of Gujarat	KICT has obtained the Principal Employer Registration certificate bearing No. ALC/ADP/46R (06)/2016. The registration has been issued on 15th November 2016.
10	Labour Licenses of Contractor	Labour and Employment Department, Government of Gujarat	The contractor engaged by KICT has obtained labour license as per the Contractor Labour and Regulation Act. The details of the labour license of the contractor are given below. <ul style="list-style-type: none"> M/s A.P Logistics: Licence No. ALC/ADPR/46(35)/2017, valid till 24.01.2022 M/s Mas Marine Services: Licence No. CLRA/ ALCADIPUR/ 2019/L-48, valid till 10.03.2022 M/s Sailani & Co: Licence No. CLRA/ALCADIPUR/2019/L-127, valid till 18.07.2021 Z Plus Services: Licence No. ALC ADP 46R062016 of the Contract Labour and Regulation, 1970 valid till 18.12.2023. Licence No 0812091/Kutch-East under Private Security Regulation Act, 2016, valid till 17.10.2021

Note: Any specific findings and non-compliances with respect to the permits and licenses are covered in Section 4.

3.2 Applicable IFC Performance Standards

The applicability of the IFC Performance Standards (2012) have been explored and the details are provided below.

Table 3-2 IFC Performance Standards

Performance Standards	Description	Applicability
IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts	This PS aims to assess the existing social and environmental management systems of a company/ project and to identify the gaps with respect to their functioning, existence and implementation of any Environmental and Social Management Plan (ESMP) and procedures, a defined EHS Policy, institutional structures with defined roles and responsibilities, risk identification and management procedures as well as processes like stakeholder engagement and grievance management.	Applicable PS 1 is applicable to projects with respect to environment and/or social risks and/or impacts. As the project activity includes handling and movement of containers, it is essential to have a defined mechanism towards assessment and management systems of associated environmental and social risks and impacts.
PS 2- Labour and Working Conditions	This IFC PS is guided by several international conventions and instruments on labour and workers'	Applicable

Performance Standards	Description	Applicability
	<p>rights. It recognizes that the pursuit of economic growth (through employment creation and income generation) should be accompanied by protection of fundamental rights of workers.</p> <p>Key themes are the following -</p> <ul style="list-style-type: none"> • Human resource policy and management; • Workers' organization; • Non-discrimination and equal opportunity, • Retrenchment; • Protecting the workforce; and • Occupational health and safety. <p>It applies to workers directly engaged by the employer (direct workers), workers engaged through third parties to perform work related to core business processes of the project for a substantial duration (contracted workers), as well as workers engaged by the client's primary suppliers (supply chain workers).</p>	<p>The project has engaged labour for loading, unloading and maintenance work for day-to-day operation of the terminal. This includes both employees of KICT as well as contract workers engaged by KICT.</p>
<p>PS 3: Resource Efficiency and Pollution Prevention</p>	<p>The objective of PS-3 is to avoid or minimize adverse impacts of pollution on human health and the environment by avoiding or minimizing pollution from project activities; to promote more sustainable use of resources, including energy and water, and to reduce project-related GHG emissions. The assessment covers requirements related to mitigation measures, management plans, and conservation and efficient use of resources.</p> <p>Key themes include the following -</p> <ul style="list-style-type: none"> • Pollution prevention; • Resource conservation and energy efficiency; • Wastes management; • Hazardous materials handling and storage • Emergency preparedness and response; • Greenhouse Gas emissions; • Pesticide use and management. 	<p>Applicable</p> <p>The project involves activities such as operation and maintenance of D.G. sets, generation, storage and handling of hazardous wastes and hazardous materials, generation of wastewater, and emission from vehicles, which is likely to impact humans and the environment adversely.</p>
<p>PS 4 Community Health Safety and Security</p>	<p>PS-4 requires due diligence to anticipate and avoid adverse impacts on the health and safety of the affected community during the project life from both routine and non-routine circumstances. It also requires ensuring that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the affected community.</p> <p>Key themes include the following -</p> <ul style="list-style-type: none"> • Infrastructure/equipment safety; • Hazardous material safety; • Natural resource issues; • Exposure to disease; • Emergency preparedness and response; • Security personnel. 	<p>Applicable</p> <p>This PS will assess the existing systems related to health, safety and security of workers. The project has limited impact on the local communities as there are no human settlement near to the project site. However, the project has engaged both direct and contract workers to provide security to safeguard its personnel and the premises who in turn form an integral part of the local community. Thus, PS 4 aim to assess risks and security management systems for the project.</p>
<p>PS 5 Land Acquisition and Involuntary Resettlement</p>	<p>PS-5 requires project proponents to anticipate and avoid, or where avoidance is not possible, minimize adverse socio-economic impacts from land acquisition or restrictions on land use.</p> <p>The key themes covered under this are</p> <ul style="list-style-type: none"> • Compensation and benefits for displaced persons • Consultation and grievance mechanism, 	<p>Not Applicable</p> <p>This PS is not applicable as the KICT is located within DPT complex and will not require any additional land and the activities will be limited within the existing battery limits. In addition, no fishing activity is reported along the</p>

Performance Standards	Description	Applicability
PS 6 Biodiversity Conservation and Sustainable Management of living Resources	<ul style="list-style-type: none"> Resettlement planning and implementation, physical displacement, economic displacement. <p>This PS applies to projects that are (i) located in modified, natural, and critical habitats; (ii) that potentially impact on or are dependent on ecosystem services over which the client has direct management control or significant influence; or (iii) that include the production of living natural resources (e.g., agriculture, animal husbandry, fisheries, forestry). PS-6 screens relevant threats to biodiversity, especially focusing on habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, and pollution.</p>	<p>creek area and hence impact on livelihood is not envisaged</p> <p>Not Applicable</p> <p>All dredging activities are responsibility of DPT and KICT is not responsible for dredging. In addition, there is no discharge of treated wastewater into the sea. It was further understood from the KICT authorities, that DPT does not allow discharge of bilge water from vessels into the marine environment from the ships entering the berth area. As per MARPOL regulations, bilge water has to be discharged in open sea and discharge is not permitted near the shores. The oil content in the bilge water has to be reduced to 5ppm before discharge. Also, reportedly, DPT does not allow bilge water from ships to be discharged in the sea or in port premises. Thus, no direct impact is envisaged on marine life in the vicinity of the project site due to project activities.</p>
PS 7: Indigenous Peoples	<p>PS-7 applies to communities or groups of Indigenous Peoples who maintain a collective attachment, i.e., whose identity as a group or community is linked, to distinct habitats or ancestral territories and the natural resources therein. PS-7 endeavour to ensure that the development process fosters full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of Indigenous Peoples. Key themes covered include</p> <ul style="list-style-type: none"> consultation and informed participation, impacts on traditional or customary lands under use, relocation of IPs from traditional or customary lands, cultural resources. 	<p>Not Applicable</p> <p>The operation of KICT does not have any impacts on any communities, including indigenous communities. The nearest human settlement is located beyond 10 km away from the KICT project site outside DPT premises.</p>
IFC PS-8: Cultural Heritage	<p>PS 8 applies to any tangible forms of cultural heritage; unique natural features or tangible objects that embody cultural values or certain instances of intangible forms of culture that are proposed to be used for commercial purposes. The PS applies to any type of features which has cultural importance to local population. It may or may not be notified.</p>	<p>Not Applicable</p> <p>The KICT site is within the DPT premises, and there are no buildings and structures of cultural, archaeological and religious significance</p>

3.3 Applicable ILO Conventions

C001 - Hours of Work (Industry) Convention, 1919

As per Article 2 of ILO COO1-Hours of Work Convention, the hours of work on one or more days of the week are less than eight, the limit of eight hours may be exceeded on the remaining days of the week by the sanction of the competent public authority, or by agreement between such organisations or representatives; provided, however, that in no case under the provisions of this paragraph shall the daily limit of eight hours be exceeded by more than one hour.

Article 4: The limit of hours of work prescribed in Article 2 may also be exceeded in those processes which are required because of the nature of the process to be carried on continuously by a succession of shifts, subject to the condition that the working hours shall not exceed fifty-six in the week on the average. Such regulation of the

hours of work shall in no case affect any rest days which may be secured by the national law to the workers in such processes in compensation for the weekly rest day.

India ratified to this convention on 14th July 1921.

C0026-Minimum Wage Fixing Machinery Convention 1928

This Convention requires to create or maintain machinery whereby minimum rates of wages can be fixed for workers employed in trades or parts of trades (and in particular in home working trades) in which no arrangements exist for the effective regulation of wages by collective agreement or otherwise and wages are exceptionally low. India ratified to this convention on 10th January 1955.

C029-Forced Labour Convention, 1930

This convention aims to suppress the use of forced labour in all its forms irrespective of the nature of the work or the sector of activity in which it may be performed. The Convention defines forced labour as "all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily", with few exceptions like compulsory military service. India ratified to this convention on 30th November 1954.

Protection against Accidents (Dockers) Convention (Revised), 1932

This convention is applicable to work performed on shore or on board ship of loading or unloading any ship whether engaged in maritime or inland navigation in, on, or at any maritime or inland port, harbour, dock, wharf, quay or similar place at which such work is carried on. The convention emphasizes on safe means of access for the use of the workers such as gangways, ladders, etc. Safety measures to be adopted during the loading and unloading process are mentioned in the convention. Medical facilities to be available at the facility is also stipulated. India ratified to this convention in February 1947.

3.4 Applicable National EHS and Social Regulations

Table 3-3 provides a list of applicable EHS and social regulations under the host country legal framework.

Table 3-3 Applicable EHS and Social Regulations

Key EHS Acts and Rules	Key Social Acts and Rules
<ul style="list-style-type: none"> • Water (Prevention and Control of Pollution) Act, 1974 as amended up to 1988. • Water (Prevention and Control of Pollution) Rules, 1975. • Air (Prevention and Control of Pollution) Act, 1981 as amended up to 1987. • Air (Prevention and Control of Pollution) Rules, 1982 • Environmental Protection Act, 1986. • Environment (Protection) Rules, 1986 and Amendment Rules • Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 • Bio-Medical Waste Management Rules, (BMW) 2016 • Solid Waste (Management) Rules 2016 • E-Waste (Management) Rules, 2016 • Petroleum Act, 1934 • Dock Workers Safety Act • The Fire & Emergency Service, Fire Prevention and Fire Safety Act, 2016. • Major Port Act, 2020 • Transport, handling and Storage of Dangerous Goods in the port of Kandla Regulations, 1991 	<ul style="list-style-type: none"> • Contract Labour (Regulation and Abolition) Act, 1970. • Payment of Wages Act, 1936 (amendments thereafter). • Employees Provident and Miscellaneous Provisions Act, 1952 (amendments thereafter). • Maternity Benefit Act, 1961 (amendments thereafter). • Payment of Gratuity Act, 1972. • Employees State Insurance Act, 1948. • Child Labour (Prohibition and Regulation) Act, 1986. • Bonded Labour System (Abolition) Act, 1976. • Industrial Disputes Act, 1947 • Minimum Wages Act, 1948. • Central Minimum Wages Rules, 1950 and Gujarat Minimum Wages Rules 1961 • Equal Remuneration Act, 1976. • Interstate migrant workmen act 1979 • Private Securities Agencies Regulation Act. 2016

3.5 Other International Regulations

3.5.1 ISPS Code

The International Ship and Port Facility Security (ISPS) Code is an amendment to the Safety of Life at Sea (SOLAS) Convention (1974/1988) on maritime security including minimum security arrangements for ships, ports and government agencies. The code lays down rules and regulation for shipping companies, shipboard personnel, and port/facility personnel to "detect security threats and take preventive measures against security incidents affecting ships or port facilities used in international trade. The ISPS Code mandates that shipping lines, ports and terminals are required to place appropriate security officers/personnel on each ship, in each port facility and in each shipping company to prepare and to put into effect the security management plans.

The ISPS codes also mandates three level of security system:

Security Level 1 - Normal: This is the level at which the ships and port facilities operate under normal conditions. Minimum protective measures are maintained at all times in this category.

Security Level 2 - Heightened – This is a level that applies whenever there is a heightened risk of a security incident. At this level, additional security measures are implemented and maintained for that period of time. This includes use of central forces such as CISF and marine forces. This time frame is determined by the security experts on the ship or at the port facility.

Security Level 3 – Exceptional – At this level, it is considered that a security incident is imminent and specific security measures will have to be implemented and maintained for that period of time. At this level, the security experts will work in close conjunction with government agencies and follow specific protocols and instructions.

As per the Directorate General of Shipping, Deendayal Port, Kandla is a Security Level 2 Port. Thus, the security of the port is managed by Central Industrial Security Force (CISF) on the land side and Marine Police on the seaside. Although the internal security of KICT is managed by their own security force, the overall DPT area is under the jurisdiction of CISF.

4. Gap Assessment and Project Categorisation

A gap assessment of the environmental and social performance of KICT operation has been undertaken vis-à-vis the applicable reference framework and presented in this section. Tables 4.1 to 4.4 provides a description of key issues and observations against the applicable IFC performance standards.

4.1 IFC PS-1: Assessment and Management of Social & Environmental Risks and Impacts

S.N.	Aspects	Observations	Gaps	Recommendation
1.	<p>Environment and Social Assessment and Management System (ESMS)</p> <p>As per PS 1, the client should establish and maintain an Environmental and Social Management System (ESMS) appropriate to the nature and scale of the project and commensurate with the level of social and environmental risks and impacts throughout the life cycle of the project. The ESMS should incorporate elements pertaining to policy, identification of risks and impacts, management programs, organizational capacity and competency, emergency preparedness and response, Monitoring and review, stakeholder engagement, and external communications and grievance mechanisms.</p>	<p>KICT has developed and is implementing an Integrated Management System (IMS) as per ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 (the new standard on Occupational Health and Safety Management Systems that has superseded the OHSAS 18001:2007). KICT is also implementing a Security Management System (SMS) certified to ISO 28000:2007 standards. All the certifications are valid till 22.01.2022</p> <p>The Integrated Management System of KICT comprises of 7 elements as per IFC requirement for ESMS. These include policy, risk identification and impacts, management programs, organizational structure and responsibilities, emergency response, external communication and grievance mechanism, monitoring and review. The IMS of KICT lacks a Stakeholder Engagement Plan, and a mechanism for grievance redressal for contractor workers.</p> <p>KICT has developed and is implementing a Quality Environment Health and Safety Apex Manual as per ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The QEHS manual include details on aspects such as hazard identification and assessment of risk and opportunities, legal requirement and compliances, competence and awareness, internal and external communication processes, EHS training and awareness, emergency response plans, monitoring and measurement, incident investigation, non-conformity, corrective and preventive actions, general safety rules, office safety and maintenance safety.</p> <p>KICT has also developed an Occupational Health & Safety Management System (OH&SMS) with the</p>	<p>Although the IMS of KICT is aligned to the IFC PS, there is no mention of the PS in the reference framework.</p> <p>No systems/ procedures developed for Stakeholder Engagement and Grievance Mechanism for Contractual Workers.</p>	<p>KICT is recommended to modify the reference framework mentioned in the IMS and related documents to include IFC Performance Standards.</p> <p>KICT is recommended to develop a Stakeholder Engagement Plan and update the existing Grievance Redressal Mechanism as per IFC PS requirement. The mechanism should include anonymous reporting of grievance for KICT employee and Contractual Workers. The same should be made aware to workers and employees.</p>

S.N.	Aspects	Observations	Gaps	Recommendation
		<p>objective of commitment to prevention of injury and ill-health at workplace, compliance to legal and statutory requirement, control/assess OH&SMS risks and create awareness of employee on OH&SMS obligations. The manual comprises of detailed procedures for identification and assessment of risk and opportunity, applicable OH&SMS requirement, training schedule and communication plan. The manual also specifies the general safety rules for employee and contractor, office safety, maintenance safety for equipment which includes handling of chemicals and hazardous substances, incident investigation and reporting, fire safety, EHS reporting, etc.</p> <p>In addition to the above documents, KICT has also developed a separate Quality and Environmental Procedural Manual for all KICT operational activities. The manual forms part of QEHS management system and contains the procedures and formats for the systems provided in the Quality, Environment, Health and Safety Apex Manual. The manual encompasses procurement systems, operation systems such as vessel operation, yard operation containers discharge operations, handling of hazardous containers, reefer containers, etc., rail operations and bunkering operation. The procedural manual also details the procedure for security and gate pass system, and waste management procedures.</p>		
2.	<p>Policy</p> <p>The Client will establish an overarching policy defining the environmental and social objectives and principles that guide the project to achieve sound environmental and social performance.</p>	<p>KICT has adopted a Quality, Health, Safety and Environment Policy signed by the President and COO of ICPTL. Apart from QHSE policy, KICT follows Corporate POSH Policy and Security Management Policy. However, KICT does not have a Corporate Social Responsibility Policy both at the corporate and site level. As reported by the site representatives KICT has formulated CSR Plan for a sanitation and hygiene project, which will be initiated</p>	<p>KICT does not have a CSR Policy. As per Section 135 of India's Companies Act, it is mandatory for companies whose a) networth is Rs 500 crore or more; or (b) turnover is Rs 1000 crore or more; or (c) net profit is Rs 5 crore or more, to spend two percent of their average net profit for the past three years on</p>	<p>KICT is recommended to formulate a CSR Policy to ensure that all CSR plans developed is in line with the company policy specifying company's commitment towards sound social performance. This can be an independent policy or integrated in the</p>

S.N.	Aspects	Observations	Gaps	Recommendation
		once the COVID situation in Gandhidham area improves.	<p>CSR. KICT needs to adhere to the above clause as applicable.</p> <p>Section 4 (1) and Section 6 of the Rules requires that the CSR activities undertaken by the company, should be as stated in the CSR Policy, (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business. Without a proper CSR Policy there will be no direction while planning for CSR activities and may reduce the effectiveness of programs implemented.</p>	Quality, Health, Safety and Environment Policy.
3.	<p>Identification of Risks and Impacts:</p> <p>The client will establish and maintain a process for identifying the environmental and social risks and impacts of the project. The type, scale, and location of the project guide the scope and level of effort devoted to the risks and impacts identification process. The scope of the risks and impacts identification process will be consistent with good international industry practice and will determine the appropriate and relevant methods and assessment tools</p>	<p>As reported, an EIA for the whole facility (including Berths 11 and 12) was prepared prior to start of construction which was undertaken in the year 2002-2003. However, the EIA report was not available for review.</p> <p>KICT has developed procedures for conducting Hazard Identification and Risk Assessment (HIRA) and a HIRA matrix has been also developed for the site. The HIRA covers activities related to bunkering operation, rail operation, yard operation and vessel operation. However, activities such as risks related to spillage of oil, handling of STP sludge and hazardous waste etc. were observed missing and highlighted to KICT. The revised HIRA has been provided on 29.06.2021 incorporating the aforesaid missing activities.</p> <p>As part of the QHSE manual, KICT has defined methodologies for impact identification as per ISO 14001:2015 for emission to air, releases of wastewater, uses of raw material, noise, odour, waste and energy emitted.</p> <p>The site has developed a Legal Register and Matrix. The document was last reviewed on 30.09.2020.</p>	<p>The site has developed a Legal Register and Matrix. However, review of the documents indicates that all social and environment related requirement such as Minimum Wages Act, Biomedical Waste Handling, etc are not updated in the Register.</p>	Update the Legal Register for inclusion of all social and environmental related statutory requirements.

S.N.	Aspects	Observations	Gaps	Recommendation
4.	<p>Management Programs</p> <p>Consistent with the client's policy and the objectives and principles described therein, the client will establish management programs that, in sum, will describe mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project.</p> <p>Depending on the nature and scale of the project, these programs may consist of some documented combination of operational procedures, practices, plans, and related supporting documents (including legal agreements) that are managed in a systematic way. The programs may apply broadly across the client's organization, including contractors and primary suppliers over which the organization has control or influence, or to specific sites, facilities, or activities.</p>	<p>KICT had developed an EMP for their operation. The document has identified the key environmental parameters likely to be impacted by the operation of the project. Roles and responsibilities of KICT and contractors have been spelled out clearly in the document. Aspects such as training and organizational structures have been defined. The document was found to be aligned with the QHSE Policy of KICT. The KICT staff was found to be aware of the procedures given in the plan.</p> <p>During induction, training on environment management was provided to the KICT and contractor staff.</p>	<p>Since KICT has not obtained the possession of additional 51,600 sq.m area of land from DPT, it does not have any Construction Environmental Management Plan (CEMP) which would be required for the development of land including construction activities like pavement of the surface, construction of stormwater drains, and installation of lighting poles.</p>	<p>Once possession of the additional 51,600 sq.m land is obtained from DPT, KICT is recommended to develop a Construction Environmental Management Plan prior to commencement of construction activities at empty container site including mitigation measures in compliance to the conditions stipulated in the letter issued by DPT to KICT dated 01.03.2021 (Ref No: MS/WK/4003-XI/ Gim – 325) expressing their willingness to provide the land to KICT on lease.</p>
5.	<p>Organizational Capacity and Competency</p> <p>The client, in collaboration with appropriate and relevant third parties, will establish, maintain, and strengthen as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. Specific personnel, including management representative(s), with clear lines of responsibility and authority should be designated key environmental and social responsibilities should be well defined and communicated to the relevant personnel and to the rest of the client's organization. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous environmental and social performance.</p>	<p>EHS at the project site is headed by a Deputy General Manager, QHSE, who reports to the Terminal Head of KICT. The QHSE head is supported by 4 Executives (QHSE), one Jr. Executive (QHSE) and one trainee. KICT has an EHS organogram and reporting structure for the team.</p> <p>KICT has a structured EHS training programs on E&S matters, health and safety, first aid. The training is provided to all staff including contractor workers. Copies of training logs for the month of April 2021 indicated that 18 training sessions (not more than 2 hours for each session) was conducted for contract labour and 6 sessions on fire safety, vessel operation, vehicle safety were conducted for KICT employee. About 372 workers have received EHS training. Training is delivered through a combination of videos, presentations, and mock drills.</p> <p>In addition, safety induction was also provided to both contract workers and KICT employees.</p>	<p>During the site visit, it was observed that workers were not aware of the grievance mechanism, HR policies and labour laws and associated benefits entitlements. They had never received trainings on these aspects. However, post site visit and based on subsequent discussion, KICT has included training sessions to sensitize workers on the above-mentioned topics and in order to do so, updated their Annual Training calendar for the year 2021. Hence no gap exists.</p>	<p>No recommendation</p>

S.N.	Aspects	Observations	Gaps	Recommendation
		<p>During site visit, it was observed that contract workers were not aware about the grievance mechanism, HR policies, and labour laws and benefits such as insurance coverage/workmen compensation etc. Also, the training topics on grievances mechanism and workers benefits were found to be missing in the Annual Training Calendar. However, the same has now been updated in the training calendar and submitted on 29.06.2021. As per the revised calendar, the first training program on grievances and workers benefits has been scheduled for August 2021.</p>		
6.	<p>Emergency Preparedness and Response (EPRP) Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS will establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.</p>	<p>KICT has developed an Emergency Preparedness and Response Plan which includes details on:</p> <ul style="list-style-type: none"> o Key personnel, their responsibilities and communication, o Emergencies and response procedure (fire, flood, cyclone, earthquake, epidemic, infiltration from seaside, man overboard) o Storm warnings o Different levels of emergencies and o Emergency contact numbers <p>The ERP document was last reviewed on 22.10.2020. A yearly/monthly calendar and training module has been developed and is being implemented on-site.</p> <p>The KICT employees including security personnel are provided with training to combat any kind of emergency on-site. The review of the training calendar for the year 2021 reveal that ERP training program is planned for both KICT employees as well as for contract workers.</p> <p>KICT conducts quarterly mock drills on different aspects of emergencies such as fire, cyclone, earthquake, tsunami, serious bodily injury, bomb threat, man overboard, infiltration from seaside. A simulation exercise on any one of the events of on-site emergency plan are considered during mock drill exercise.</p>	No gaps	No recommendation

S.N.	Aspects	Observations	Gaps	Recommendation
		<p>The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format.</p> <p>KICT has also developed a COVID-19 Management Plan. Reportedly all employees and workers are made aware and trained on COVID-19 precautionary measures. The workers are also provided with COVID-19 PPE kits such as masks, gloves as prevention.</p>		
<p>7.</p>	<p>Monitoring and Review</p> <p>The client will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements. The client's monitoring program should be overseen by the appropriate level in the organization. For projects with significant impacts, the client will retain external experts to verify its monitoring information. The extent of monitoring should be commensurate with the project's environmental & social risks and impacts along with compliance requirements.</p>	<p>Safety</p> <p>KICT conducts both internal inter-terminal audits and external safety audits once in a year. The last external audit was conducted on 19th and 20th January 2021. The audits are conducted to evaluate the effective implementation of Quality Management System, EMS, OHS and Integrated Management System etc.</p> <p>The latest internal audit closure report indicated a series of OHS Corrective Action Plan such as non-availability of fire extinguishers in administration LMV vehicles, OPS and Engineering LMV utility vehicle which are operating in the terminal, Mock drill with internal KICT team on topics such as smoke/fire in mobile equipment, container toppling, medical emergency drill, accident between RTGC and truck, etc. was not conducted. All the non-compliances were reported to be closed as of date.</p> <p>The external audit for Berths 11 & 12 was conducted by IRCLASS System and Solution Private Limited. The audit report indicated no major non-compliance and an overall effectiveness of Management System Certification for the audit period was provided.</p> <p>It was found that KICT has a daily safety checklist for ITV vehicle, RMQC pre-operational checklist, and daily shift safety checklist. The checklists are reviewed in the monthly safety meetings.</p>	<p>Display of environmental data (information board) was found missing. As per section 5.6 clause (22) of the CCA, KICT must display data outside the main gate of KICT of the nature and quantity of the hazardous waste generated, and environment parameters tested.</p>	<p>KICT to display environmental information board showing emissions, water consumption, wastewater generation and hazardous waste generation.</p>

S.N.	Aspects	Observations	Gaps	Recommendation
		<p>Environment</p> <p>KICT undertakes regular monitoring for ambient air, noise, DG set stack emissions, drinking water quality, treated wastewater quality etc. as per conditions stipulated in environmental clearance and CCA. All monitoring is carried out by CCS Enviro Control LLP, a NABL accredited laboratory (Accreditation Number ISO/ IEC 17025:2017)</p> <p>KICT submits half-yearly compliance report to DPT. The monitoring report of the entire port facility is then compiled and forwarded to the GPCB by the DPT.</p> <p>KICT also has an internal monitoring system. The monthly reporting to Management/Directors also includes details of OHS indicators such as lost time incidents (LTI), first aid cases, near miss and HSE events and details of QHSE audits, trainings and emergency drills carried out.</p> <p>KICT has an internal Safety Committee. comprising of 23 members. This includes 4 representatives from contractors and 19 members from different KICT department (Security, HR, Engineering and operation). The committee is chaired by the Head of the terminal with Head QHSE being the member secretary to the Committee. The Committee meets on a quarterly basis for safety reporting. The last safety meeting was conducted on 15th April 2021.</p> <p>For monitoring contractor safety performance, a checklist has been developed and implemented at site. The aspects covered includes awareness about emergency response, exits/evacuation procedures including emergency contacts, incident reporting system, provision of PPEs, availability of supervisor, awareness about job hazard and associated risk, permit to work, handling of chemical, proper maintenance of equipment (crane, vehicle, tools, electrical/welding generator), and training undertaken on HSE aspects. The findings are submitted to QHSE department for deciding any further improvement such as</p>		

S.N.	Aspects	Observations	Gaps	Recommendation
		<p>addition of new training components and reinforced toolbox talk to particular contractor and workers. The discrepancies are also shared with the contractor during the monthly contractor meeting.</p> <p>Daily toolbox talk is conducted in which inputs related to environment safety are provided.</p>		
8.	<p>Stakeholder Engagement</p> <p>Clients should identify the range of stakeholders that may be affected by port activities and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities, the client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities.</p>	<p>The main stakeholder of KICT is Deendayal Port Trust, Container Freight Stations (CFS) agents, contractworkers. However, the site does not have formalized Stakeholder Engagement Plan in place.</p> <p>It was found that the nearest settlements are beyond 10-km of the KICT site. Thus, it can be inferred there will be no impact of the project activities on local communities.</p>	<p>KICT does not have a formalized Stakeholder Engagement Plan.</p>	<p>KICT needs to develop a SEP scaled to their project risks and ensures implementation of the same.</p> <p>The SEP so developed should document stakeholder analysis, planned stakeholder engagement activities based on short, medium and long-term planning timetables, responsibilities, grievance redressal mechanism and reporting procedures. The SEP implementation status should be reported to the QHSE Department every quarter.</p>
9.	<p>External Communications and Grievance Mechanisms: Clients will implement and maintain a procedure for external communications. In addition, Clients will establish a grievance mechanism to receive and facilitate resolution of Affected Communities concerns and grievances about the Client's environmental and social performance.</p>	<p>Grievance Redress Policy has been developed for KICT employees. The Policy has outlined a three-stage approach with timelines for resolving complaint/grievances raised by KICT employees. The GR policy has a grievance committee comprises of Business Vertical Head and HR Head.</p> <p>Reportedly, all grievances are being resolved informally between the supervisor and the HR Department. No records of grievance are maintained. All grievances are being recorded informally and verbatim. During site visit a complaint box was observed near the labour restroom.</p> <p>KICT, as part of the IMS, has in place procedures for receiving and responding to external communication. The procedure details the roles and responsibilities of key personnel.</p>	<p>KICT has no grievance mechanism developed for external stakeholders i.e. affected communities since there is no community located near KICT premises and nearest human settlement is located beyond 10 km away. It has been reported that DPT has a blanket grievance mechanism for entire DPT area.</p>	<p>All grievance should be recorded, and grievance register should be maintained. The grievances recorded (open/closed) should be reported monthly. All workers should be made aware and provided training on the process of GRM. Even though local communities are located far away, KICT is recommended to put in place a formal procedure to: (a) receive concerns and grievances from members of affected communities if any. This is as per IFC PS requirement,</p>

4.2 IFC PS-2: Labour and Working Conditions

S. N.	Aspects	Observations	Gaps	Recommendation
1.	<p>Human Resource Policies and Procedures</p> <p>The Client will adopt and implement human resource policies appropriate to its size and workforce that sets out an approach to managing workers consistent with the requirements of this performance standard and the national law.</p>	<p>KICT has Human Resources (HR) Policies and Procedures that apply to the direct employees of KICT. The Policy was found to be compliant to the IFC PS2 requirements and had policies related to Forced and Compulsory Labour, Child Labour, Sexual Harassment, Gender Diversity, Whistle Blower Policy, Equal Opportunity, Recruitment, Termination & Retrenchment and Employees Grievance.</p> <p>The HR manual includes information on entitlements such as:</p> <ul style="list-style-type: none"> o Leave o Attendance o Code of Conduct o Working Hours o Holiday o Maternity Benefit o Medical benefits, o Provident fund (PF) and other applicable allowances. o Gratuity <p>KICT has adopted Group Policy on Prevention of Sexual Harassment (POSH). For ensuring a safe workplace for women, a Sexual Harassment Committee has been formed at the corporate level. The Committee has the Vice Chairman of the JM Baxi Group as the head of the committee and two members from each terminal promoted by JM Baxi. Group are members to the committee. One KICT female employee is a member of the committee. POSH workshop /awareness program are conducted for female KICT employees with the last one organized on 16.06.2021.</p>	<p>The existing HR policy of KICT does not have a specific policy on collective bargaining/freedom of association.</p> <p>Moreover, the termination/retrenchment policy developed for the project is not in line with IFC requirement. The Termination/Retrenchment Policy stated mainly about termination of employee and there is no mention of collective dismissals. The plan further lacks scope for consultation with workers, and measure in case retrenchment is non-avoidable.</p>	<p>KICT is recommended to update the HR policy and to include the Freedom of Association/Collective Bargaining Policy.</p> <p>KICT is also recommended to revise the existing Retrenchment Plan in line with IFC Good industry Practice-Managing Retrenchment.</p> <p>Proper documentation of the proceeding of meetings of Sexual Harassment Committee should be made.</p>

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>During site visit it was found that wage register (Form B) is being maintained by the contractors.</p>		<p>the provisions of applicable labour laws.</p> <p>KICT should also undertake periodic compliance review of the provisions of applicable labour laws.</p> <p>It is recommended that the OT hour worked, and payment are duly filled in designated column as provided in Form B.</p> <p>Presently, KICT is manually maintaining all attendance record for contract workers. KICT is recommended to strengthen the mechanism for monitoring the working hours for contract workers (e.g. electronic system for attendance and tracking contract worker)</p> <p>Review of the HR process regularly to ascertain that compliance to HR rules are followed by contractors.</p>
		<p><u>Minimum wages</u></p> <p>Review of the salary sheet indicates that contract workers are being paid the minimum wages. Thus, all contractors were found to be complying with the Gujarat Minimum Wages notification dated 23rd April 2021.</p>		
		<p><u>Terms of Employment</u></p> <p>As reported, appointment letters were issued to KICT employees. The appointment letters have information relating to terms of employment, roles, basic salary etc. Review of sample appointment letter for contractor indicated that the letter of employment details the job title, date of employment, salary, leave and holidays. The</p>	<p>As per consultation with Contractor representatives of Mas Marine, M/s Sailani & Co, it was found that appointment letters were not issued to their workers.</p>	<p>KICT is recommended to ensure all contractors issue appointment letter to their workers. The appointment letter so issued should include the following</p> <ul style="list-style-type: none"> • Workers' job title and place of work; • Date of employment; • Duration of the contract; • Working hours;

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>appointment letter also mentions about standard employment rules.</p> <p>Contract workers of Z-plus and AP Logistics were provided appointment letter/contract agreement prior to their engagement. However, the appointment letter was not made available for review.</p>		<ul style="list-style-type: none"> • Salary, social security benefits and deduction; • Leave; • Overtime rules and compensation; • Notice period which the worker can expect to give and receive on termination of employment; • Rights to join any union/collective bargaining; • Disciplinary procedures
		<p><u>Benefits</u></p> <p>All KICT employees are covered under the ESIC, and provident fund. The contractor workers are also covered under the Provident Fund and Workmen Compensation Act. Review of the insurance policy document confirmed the same and all policy coverage are valid up to date.</p>		
		<p><u>Facilities</u></p> <p>The KICT employees and workers are provided with basic amenities such as canteen, drinking water, toilet facilities and restroom. As observed during site visit, drinking water with coolers are installed in key locations near Berth 11, canteen area and workers' restroom.</p>	<p>During site visit, it was observed that the air-conditioned rest-room facilities for the crane operators is 20 feet with double bunkbeds. There was no adequate space for movement especially in case of emergencies.</p>	<p>The rest room for crane operators should be provided with adequate space. There should be a minimum space of 1 metre between beds. As per guidance note by IFC and EBRD on Workers Accommodation Processes and Standard, 'double deck bunks are not advisable for fire safety and hygiene reasons. In places double</p>
		<p><u>Labour restroom</u></p> <p>It was found that workers such as crane operator and lashers were provided with breaks after two hours of work, as the work is very tiring. During site visit it has been observed that a labour restroom was provided for workers. The restroom has provision of drinking water and has a sanitizer machine installed.</p>		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>There is also a separate air-conditioned rest-room facility for the crane operators.</p> <p>For external drivers there is a separate restroom near the parking area with drinking water and toilet facility.</p> <p><u>Toilets/urinal facilities</u></p> <p>Adequate toilet facility is provided and located in three places, near to jetty area, canteen area and near the gate. All toilet facilities are equipped with 24x7 running water. Hourly cleaning and checklist are maintained. Separate toilet facilities are available for female workers. As per the Dock Safety Regulation, 1990, one toilet is to be provided for every 50 dock workers and minimum of 3 toilets in each block along with one urinal for every 100 dock workers. This standard is maintained in the KICT premises.</p> <p><u>Canteen facilities</u></p> <p>KICT employee and contractor workers are provided with canteen facilities and a snack point. Reportedly, the canteen facility served cooked meals for workers. The meals served for the workers are prepared outside the KICT premises through a vendor SWAD. The vendor has obtained FSSAI license from Gujarat Food and Safety Department.</p> <p>The canteen provides food to the KICT workers at a subsidized rate. However, the provision of subsidy is not available for the contractor workers although they can avail the facility.</p>		<p>deck bunks are used, there must be enough clear space between the lower and upper bunk of the bed. Standards range from to 0.7 to 1.10 metres. KICT is recommended to follow the minimum standards as laid down in the guidance note.</p>
3.	Worker's Organization	<p>In KICT there is no trade union or workers organisation. However, it has been reported that there is a Kandla Port Worker's Union present, but none of the workers of KICT</p>	<p>Although it has been reported that there is no restriction to workers to form/join any workers association,</p>	<p>KICT is recommended to amend the clause 25 as mentioned in the contract agreement.</p>

S. N.	Aspects	Observations	Gaps	Recommendation
	their choosing without interference and to bargain collectively, the client will comply with national law. Where national law substantially restricts workers' organizations, the client will not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.	are members of the union. Also as indicated earlier, there is no policy on freedom of association/collective bargaining. During consultation with the workers, it was found that none of the contract workers are part of any trade/worker union formed by DPT or any labour union in the district/state.	review of sample contract agreement of the contractors reveal that under Clause 25 of the agreement, <i>it is stated that contractor personnel deployed at the terminal shall not unionize and/or form any kind of association.</i> This clause is applicable for all contractor engaged by KICT. The same was also observed to be included in the appointment letters of the workers.	The contractors are recommended to update the workers' appointment letters with inclusion of clause on freedom of association union/collective bargaining KICT is recommended to formulate a policy on freedom of association.
4.	Non-Discrimination and Equal Opportunity The client will base the employment relationship on the principle of equal opportunity and fair treatment and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.	KICT has 13 female employees engaged in both managerial and supervisory roles. KICT has in place a corporate policy on Non-discrimination and Equal Opportunity. This policy extends to and is applicable to full-time / part-time employees, and persons with disabilities. At the corporate level, there is an anti-discrimination committee who oversees matters and complaints regarding discrimination. A liaison officer i.e. HR Head has been designated as the key person to maintain records of the complaints filed and investigations conducted with investigation outcome and actions taken.	No gaps	No recommendation
5	Retrenchment Client to identify viable alternatives to retrenchment, a retrenchment plan will be developed and implemented to reduce the adverse impacts of retrenchment on workers.	As indicated earlier, KICT has developed a termination/ retrenchment policy. The plan focusses mainly on termination of employee due to ill-conduct. Reportedly, there has been no cases of laying-off of employees in the recent past.	KICT has developed a Termination/ Retrenchment Policy. However, the policy states mainly about termination of employee and there is no mention of collective dismissals.	KICT is recommended to update the Retrenchment Policy in line with IFC requirements and include a clause on collective dismissals. The policy should be communicated to all employee and should form part of the HR policy
6.	Grievance Mechanism The client will provide a grievance mechanism for workers (and their organizations, where they exist)	Grievance Redressal (GR) Policy has been developed for KICT employee. The Policy has outlined a three-stage	The existing GR policy is applicable only for KICT employee. There is no grievance	KICT to update the existing GRM and should include the QHSE head and a

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>to raise workplace concerns. The client will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.</p> <p>approach with timelines for resolving complain/grievances raised by KICT employee.</p> <p>The GR policy has a Grievance Committee comprising Business Vertical Head and HR Head.</p> <p>Reportedly, all grievances are being resolved informally between the supervisor and the HR. No records of grievance are maintained. All grievances are being recorded informally and verbatim. During site visit a complaint box was observed near the labour restroom.</p>	<p>redressal mechanism for contract workers and contractors.</p> <p>The exiting policy does not have scope for registering anonymous grievance/complaints.</p> <p>No grievance register is maintained by KICT. Similarly, the grievance committee comprises of just two-member committee and the existing policy lacks reporting and monitoring mechanism.</p>	<p>woman member of the staff in the Grievance Committee.</p> <p>Similarly, the existing mechanism should include scope of raising grievance for contract workers. Such mechanism should be updated in compliance with IFC PS2.</p> <p>All grievance should be recorded, and grievance register should be maintained.</p> <p>All grievances recorded (open/closed) should be reported monthly. All workers should be made aware and provided training on the process of GRM.</p>
7.	<p>Protecting the Work Force <u>Child Labour</u></p> <p>The client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development. The client will identify the presence of all persons under the age of 18.</p>	<p>KICT has a Child Labour Policy which prohibits the engagement of worker below 18 years and the same was observed to be displayed on the Notice Board. Similarly, the contract agreement between contractor and KICT has a clause prohibiting engagement of Child Labour. The worker's age is being thoroughly examined before hiring.</p> <p>For entry into KICT premises, all third-party truck drivers including workers are being checked and workers/truck drivers are to produced documents such as voter ID and Aadhar card for restricting entry of minor/ child labour. As per consultation with HR representative and security personnel, it was confirmed there is no presence of Child labour at site. This was also confirmed during site visit.</p>	<p>During site assessment it has been observed that there are no boards declaring the site as "Child Labour Free".</p>	<p>KICT is recommended to install display boards declaring the site as "Child Labour Free".</p>
8.	<p>Forced Labor</p> <p>The client will not employ forced labor, which consists of any work or service not voluntarily performed</p>	<p>KICT has a Forced Labour Policy in line with ILO, Indian Bonded Labour System (Abolition) Act 1976 and Contract Labour (Regulation and Abolition) Act 1970. No original documents such as voter's ID, Aadhaar Card, ration card,</p>	<p>No gaps</p>	<p>No recommendation</p>

S. N.	Aspects	Observations	Gaps	Recommendation
		etc. were retained by the contractor during the employment period.		
9.	<p>Occupational Health and Safety</p> <p>The client will provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women. The client will take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards</p>	<p>KICT has developed and is implementing an Occupational Health & Safety Management System. The Manual comprises of detailed procedures for identification and assessment of risk and opportunity, applicable OH&SMS requirement, training and communication plan. The Manual also specifies the general safety rules for employee and contractor, office safety, maintenance safety for equipment which includes handling of chemicals and hazardous substances, incident investigation and reporting, fire safety and EHS reporting. Operational procedures on aspects such as vessel operation, container operation and trailer movement, hazardous waste handling are also included.</p> <p>With respect to the Occupational Health and Safety Management requirements the following observations were made during document review and site visit:</p> <ul style="list-style-type: none"> • At site, the occupational health and safety of staff and workers are coordinated by KICT's EHS Department. The facility has implemented a permit-to-work system for routine and non-routine operations. • Regular training programs are organized for employees of KICT and contract workers. An updated annual training calendar is in place and workers including employees are trained on use of PPEs, vehicle and driving safety rules, fire prevention and firefighting, hazardous container handling and emergency preparedness. Trainings such as man and machine interface, contractor safety management system, grievance mechanism and workers benefits, monsoon and winter safety, electric safety etc. are 		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>conducted regularly. Training attendance sheets are maintained.</p> <ul style="list-style-type: none"> • For new employees and contract workers safety induction trainings are organized. • Toolbox talk are organized for the workers and employee on topics which includes general safety awareness, vehicle safety, gangway safety, yard safety, emergency preparedness, firefighting safety, working over water and behaviour-based safety. Workers are also oriented on the uses of PPEs. The total time for each toolbox talk was reported to be 30 minutes. • Mock drills are conducted at site quarterly. Total response time are recorded on different aspects of emergencies such as fire, cyclone, earthquake, tsunami, serious bodily injury, bomb threat, man overboard, infiltration from seaside, etc. A simulation exercise on any one of the events of on-site emergency plan are considered during mock drill exercise. The timing of the response in terms of First Responder's Response Time, time of reaching assembly point, response time of medical staff/ambulance and time of 'all clear' are recorded in a prescribed format. Table-top exercise are done prior to commencement of mock drills. • Speed limit signboard are installed in different location such as container yard, main gate and near terminal building. • During site visit it was found that workers wear PPEs such as helmet, safety shoes, harness, reflective jackets, gloves and mask. PPEs for contract workers are being provided by the respective contractor. • The KICT terminal building is equipped with an emergency exit and a demarcated assembly point 		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>located near the office building and near main gate. KICT maintains an ambulance in case of any medical emergency.</p> <ul style="list-style-type: none"> • There is one first aid facility inside the KICT premise where preliminary treatment for minor cuts and wound is administered. For serious illness/injuries, the cases are referred to a nearby hospital in Gandhidham. The first aid centre is manned by two trained and certified Paramedic staff. • For drinking water, KICT has engaged a vendor, Saroj Water Supply for providing regular supply of drinking water. Random analysis of drinking water is regularly done by Mayur Microlite Laboratory, Gandhidham, Gujarat to ensure the water quality supply to KICT complies with the Drinking Water Quality Standards IS 10500:2012. The latest analysis of the drinking water was carried out in 9th April 2021. Review of the test report indicated that all monitored parameter are within the stipulated limits. • Pre-employment health check-up is conducted for all employees including contractor workers. Health check-ups are conducted once a year for workers/employee above 40 years and once in two years for worker/employee below 40 years. 	<p>The laboratory conducting drinking water quality analysis was found to be not accredited by NABL.</p>	<p>KICT is recommended to carry out all sample analysis including drinking water quality from NABL Accredited Laboratory.</p>
		<p><u>COVID-19 Management</u></p>		
		<ul style="list-style-type: none"> • KICT has developed procedures for COVID-19 management. The procedures entail the requirement for thermal scanning of all employee/contract workers and visitors at the time of entry. The procedure also includes the requirement for 14 days quarantine in case any individual comes in contact with COVID-19 affected person. Canteen areas, office building and machinery are regularly disinfected. The procedures also limit large gathering within the premise. Use of 		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>surgical mask, sanitizer and surgical hand gloves are made mandatory for all workers and employees. Authorized hospitals to treat COVID-19 have been identified and made aware to the workers. Similarly, any workers developing COVID -19 symptoms, are required to report immediately.</p> <ul style="list-style-type: none"> Reportedly, about 28 employees were affected with COVID-19 in the year 2021 and all have recovered from COVID-19 with due precautions and medications. Workers are presently being provided training every month (2 training programs on COVID-19 is scheduled every month) on COVID-related precautionary measures. As per consultation with workers, it was reported that mask, gloves were provided. Similarly, the canteen follows staggered meal system as part of Covid-19 social distancing protocol. Post training evaluation are undertaken for all participants to record their level of understanding. In case the worker is found to have inadequate understanding, he/she is asked to repeat the training. It was observed that COVID-19 precautionary measure (do's and don'ts) both in Gujrati and English language are displayed in strategic positions. Awareness program for symptoms and precautions against COVID-19 is being provided to all workers including KICT employee. The program covers aspects such as spread and precaution, importance of mask, handwashing, gloves, social distancing norms, staggered meal/snack timing, toilet management and working in office. <p><u>Fire Safety</u></p> <p>KICT premises is equipped with fire alarms located in strategic locations such as Terminal building, labour wash area, oil dispenser area. There are 53 fire extinguishers of</p>		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>ABC, CO2, CA and Foam types in 11 locations (sub-station, near hazardous containers storage area, Maintenance yard, Gate complex, terminal building, OHC etc.). There are also 67 fire hose reels, 46 numbers of underground yard hydrant and 56 numbers of above ground yard hydrant. A fire water tank of capacity 200000 litres has been constructed in the premise. All the firefighting equipment was verified during site visit.</p> <p>KICT undertakes monthly inspections of all fire equipment. The inspection is carried out by the EHS Department. Review of inspection documents reveal that all fire equipment is found in good conditions</p> <p><u>Working at Height/Ladder</u></p> <p>Frequent Health check-up for crane operator are carried out. It has been reported that crane operators operate with breaks after every two hours to avoid fatigue and tiredness. Subsequently a reliever/ substitute takes over the operation for another two hours. Similarly, in the case of lashers, the working hours is restricted to 6 hours followed by 2 hours rest.</p> <p><u>Safety Maintenance of Equipment</u></p> <p>Cranes, Hydra, Hoists and their accessory gear are annually examined. Load test of lifting appliances was last conducted on 18th April 2021, while hydra crane and loose gear inspection was conducted on 19th January 2021.</p> <p>Gangways and accommodation ladders were found to have side netting extending from top rail to bottom steps on both sides to avoid fall.</p> <p><u>Traffic Management</u></p> <p>The site has a traffic management plan to manage the movement of trucks and ITVs. The management system is overseen by the security personnel. It has been reported that before a truck enters KICT premises it must undergo</p>		

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>checks and receive clearance from security. In the case of a new drivers not familiar to the system, security personnel escorts the truck to pick-up and drop off the containers.</p> <p><u>Safety Committee</u></p> <p>KICT has a Safety Committee that meets every quarter. The Committee is headed by the Terminal Head with the EHS Manager as the secretary of the Committee. The last safety meeting was held on 15th April 2021. In these meetings, safety reporting and incident are recorded in case of any near miss and accident on-site. As per the incident statistics since KICT operations about 57 near miss were reported on-site. The site also has in place near miss reporting tools which record types of near miss, date & time, cause and details. The reporting tools also has scope for recording the action taken and recommendation.</p> <p>KICT maintain records of accident, incidents. During consultation and review of records, it was found that there were no fatalities or Loss Time Injury recorded since initiation of KICT operation. As per consultation with contact workers, there has been no major incidents reported on site.</p> <p>KICT has in place SOP for incident reporting/investigation. As part of incident reporting, the KICT QHSE Department conduct root cause analysis of the incident and suggest corrective and preventive action plan. The investigation team comprises of EHS Manager, Operation Head, Engineering Head, HR and Security Head, Contractor representative and subject matter expert. An investigation report is prepared and the incident is updated in the incident register.</p>		

S. N.	Aspects	Observations	Gaps	Recommendation
10.	<p>Workers Engaged by Third Party</p> <p>With respect to contracted workers the client will take commercially reasonable efforts to ascertain that the third parties who engage these workers are reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the requirements of this Performance Standard</p>	<p>Principal Employer Registration Certificate (as per Section 7 of Contract Labour (Regulation and Abolition) Act, 1970 and Rules made thereunder) has been obtained by KICT. All contractor engaged by KICT has obtained the labour license.</p> <p>KICT has in place a Corporate-level General Procurement Guidelines for engaging contractors on site. A Commercial and Technical Purchase Committee determines the selection of contractor. The contractors are identified based on the technical and statutory requirement, past records, timelines, payment terms and safety precautions proposed by them.</p> <p>The contractor selected are issued terms and conditions of contract. Review of sample contractor agreement indicated that terms and conditions of employment, working hours, provision of appointment letters, ID card, insurance coverage etc are provided. The agreement also indicated contractors should comply to labour laws and safety requirements. Aspects such as payment of minimum wage, Provident Fund, Workmen Compensation are regularly monitored by KICT. Every month, KICT examines the attendance sheets and wage register of the contractors.</p> <p>Contractor are bound by KICT QHSE policy and anti-drug policy. It has been found that contractor is mandated to comply to all legal requirement such as minimum wages, PF, overtime payment, working hours etc) and other applicable provisions of Labour Laws. The contract agreement between KICT and the contractors also specify the same.</p> <p>For ensuring compliance to safety and labour requirements, a checklist for evaluation of contractor's safety performance is in place and which includes aspects such as awareness about emergency response, exits/evacuation procedures including emergency contacts, incident and reporting system, provision of PPEs, availability of supervisor,</p>	<p>Review of the procurement guideline reveal that no risk assessment (Type 1 contract: Work with high -Medium risk, Type 2 low risk potential) on the contract work has been performed. Similarly, the selection criteria are found to be generic and there are no pre-qualified selection criteria developed. Similarly, the committee does not have an EHS manager as member to the committee to examine the HSSE requirement</p> <p>As indicated in the contract agreement with contractor, all contractors should follow the guidelines as specified in the Contract Labour Management System. However, it has been reported that this system is not in place and there is no Contractor Management Plan.</p>	<p>As KICT are engaging about 12 contractors for different categories of work which involve high risk such as work at height, lashers etc, it is recommended that a Contractor Management Plan be developed to streamline the engagement process for contractors. Similarly, the contractor management plan should include a pre-qualification criterion prior to engaging any contractor. The CMP should include details on the following aspects:</p> <ul style="list-style-type: none"> - Risk assessment and Contractor pre-qualification - Contractor selection and operation - Contract Execution - Contractor Performance Evaluation and Monitoring - Roles and responsibilities for managing CMP

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>awareness about job hazard and associated risk, permit to work, handling of chemical, proper maintenance of equipment (crane, vehicle, tools, electrical/welding generator), and training undertaken on HSE aspects. The findings are submitted to QHSE Department for deciding any further improvement plan such as provision of trainings and reinforced toolbox talk. If any discrepancies are found, it is shared with the contractor during the monthly contractor meeting.</p>		

4.3 IFC PS-3: Resource Efficiency and Pollution Prevention

S. N.	Aspects	Observations	Gaps	Recommendation
1.	<p>Resource Efficiency</p> <p>The client will implement technically and financially feasible and cost-effective measures for improving efficiency in its consumption of energy, water, as well as other resources and material inputs, with a focus on areas that are considered core business activities. Such measures will integrate the principles of cleaner production into product design and production processes with the objective of conserving raw materials, energy, and water. Where benchmarking data are available, the client will make a comparison to establish the relative level of efficiency.</p>	<p>The nature of operations in KICT require power/electricity for running the day-to-day operation of machinery and equipment. As reported electricity consumption by equipment (RMQC) is 70% while 30% is consumed for office building, gate complex, high mast lightings, reefer, pump house etc. The usage of power per container is recorded at 4.5-5.6 kW and each RMQC consumes electricity at the rate of 3.5 kW/hr. For the year 2020, energy consumption by the 4 RMQCs was recorded at 1526789.4 KWH</p> <p>During the site visit it was found that KICT is planning to install roof top solar power of 300kW in order to reduce their energy consumption from the grid. The proposal is still under consideration with the management</p>	<p>In KICT, presently, there are no water efficiency system in place. except reuse of treated water from the STP for gardening purposes.</p>	<p>Construct storage tank for collection of rainwater from roof top and open areas and join the existing stormwater drains with the tank.</p>
2	<p>GHG Emission</p> <p>In addition to the resource efficiency measures described above, the client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project related GHG emissions during the design and operation of the project</p>	<p>The potential greenhouse gas (GHG) emissions footprint sources for KICT operations is limited to electricity consumption, fuel energy for DG set operations, and logistics (transportation trucks etc.). KICT quantifies their Scope 1 and Scope 2 emissions. The estimated CO₂ emission for the year 2020 was 4670.134 tonnes. The approximate GHG emissions post proposed expansion is expected to be 5469.92 tonnes/year for both electricity and fuel consumption. Thus, there will be an increase of approx. 800 tonnes/year of CO₂ emissions to the existing emissions due to proposed expansion. However, with the proposed installation of e-RTGCs instead of conventional RTGCs, the net savings in CO₂ emissions is estimated to be in the tune of 42,649 kilotons/year in the initial year eventually increasing the emissions savings to approx. 218,405 kilotons/year in the future years as the percentage volume handled by e-RTGCs increase. As</p>	<p>No gaps</p>	<p>No recommendation</p>

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>per requirement specified under PS 3 section 8, "...project that are expected to or currently produce more than 25,000 tonnes of CO₂ of GHG which includes all significant sources and non-energy related sources, will require to quantify both direct and indirect emission annually as per internationally recognised methodologies. However, the total CO₂ emission by KICT found to be significantly lower as per PS 3.</p> <p>As per requirement specified under PS 3, "...the client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project."</p> <p>Reportedly, KICT plans to install roof top solar power plant that will lower the electricity consumption from the grid and result in avoidance of associated equivalent amount of potential GHG emissions. The proposal is under consideration at the management level as understood from discussion with KICT Representative.</p>		
3	Water Consumption	<p>As per the consolidated Combined Consent and Authorization (CCA) issued to DPT under the Water Act,1974, the freshwater consumption for domestic purposes is fixed at 1300 KLD and domestic wastewater at 800 KLD for the whole DPT area. This quantity is for all dry cargo, wet cargo, and loading/unloading operations, However, as the water consumption break-down exclusively for Berth 11 and 12 was not available; the threshold water consumption limit could not be ascertained. The water consumption in KICT for domestic purpose is reported to be around 52 KLD. About 4 KLD of treated wastewater is generated from the STP and utilized for gardening purposes. Due to aforesaid reason, compliance assessment could not be undertaken.</p>	No gaps	No recommendation

S. N.	Aspects	Observations	Gaps	Recommendation
4	<p>Pollution Prevention</p> <p>The client will avoid the release of pollutants or, when avoidance is not feasible, minimize and/or control the intensity and mass flow of their release. This applies to the release of pollutants to air, water, and land due to routine, non-routine, and accidental circumstances with the potential for local, regional, and transboundary impacts.</p> <p>Where historical pollution such as land or ground water contamination exists, the client will seek to determine whether it is responsible for mitigation measures.</p>	<p>Combined Consent and Authorization</p> <p>As per the requirement of the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 every plant/facility is required to obtain a CCA from the Gujarat Pollution Control Board.</p> <p>DPT has renewed its Consolidated Consent and Authorization (CCA) from Gujarat Pollution Control Board (GSPCB) (vide letter no. AWH-110594 dated 08/12/2020) and is valid till 21st July 2025. This CCA includes handling of dry cargo of capacity 26,54,00,000 MT/Month (which also includes berths 11 and 12). However, the consent for present cargo handling capacity in berths 11 and 12 is not available separately for review.</p> <p>Air Emission</p> <p>The sources of air emission include ITVs, trucks, RTGCs and DG Sets. As the whole KICT area is paved, emission of particulate matter is negligible. Also, as the traffic inside the premise is regulated, gaseous emission is also low. It was also found that it is mandatory for all vehicles operating inside the terminal to have PUC certificates. Trucks coming from outside are also checked for PUC Certificate.</p> <p>As per CCA issued by GPCB, two D.G sets of capacity 1010 KVA with stack height of 15m are permitted. It was confirmed by KICT representative that these two DG sets mentioned in the CCA are meant for Berths 11 and 12 only. During the site assessment, two DG Sets of capacity 625 KVA and 1250 KVA were observed at KICT</p>	<p>The height of DG set stacks is not as per stipulations of CPCB norms. The minimum height of stack to be provided with each of the generator set shall be $H=h+0.2(KVA)^{1/2}$, where H= Total stack height in meters.</p>	<p>Stacks of at least 12 m height should be installed for the DG sets.</p>

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>premises. However, the capacity given in the CCA is not matching with the capacity mentioned in the CCA.</p> <p>Periodic stack and ambient air quality monitoring is being done by an external monitoring agency, CCS Enviro Control LLP, a NABL accredited laboratory (Accreditation Number ISO/ IEC 17025: 2017). The last monitoring was carried out in 13th February 2021. Review of the stack emission analysis reveal that the test result is within the prescribed limits</p>	<p>During the site visit, it was noted that some parts of the KICT premises had coal dust strewn over surface apparently from neighbouring Berth 13 of DPT.</p>	<p>The sole responsibility for ensuring control of air emission lies with DPT. It is recommended that KICT should raise this concern with DPT for issuing instructions to the neighbouring berth to contain fugitive dust emission by water sprinkling at source.</p>
		<p><u>Wastewater</u></p> <p>As per the CCA condition under the Water Act, 1974, domestic wastewater should not exceed 800 KLD for the DPT area. The wastewater generation from KICT was found to be about 4KLD. However, in the absence of information/data related to allowed discharge from Berths 11 and 12, it is not possible to assess if the total discharge exceeds the allowed discharge quantity.</p> <p>The CCA also stipulates the quality of treated sewage for parameters such as pH, BOD, Suspended Solids and Faecal Coliform. From the review of the operational 5 KLD STP outlet monitoring report dated 13th February, 2021, it was found that the quality of the wastewater is within the Gujarat Pollution Control Board stipulated standards. The wastewater standards given in the IFC EHS Guidelines define certain parameters such as pH, BOD, COD, Oil & Grease, Total Suspended Solids, coliform, total nitrogen and phosphorous. All these parameters were also found within the prescribed standard.</p>	<p>Plastic waste and other solid materials were observed inside the oil & grease separation pit</p>	<p>Regular cleaning of drainage system and water collection tanks should be done</p>

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>from parking and container storage areas. This water is directly released to the DPT drain located outside the KICT terminal. The stormwater run-off from the maintenance yard which has oil & grease is collected in an oil & grease separation pit associated with the stormwater network before the final release. KICT reuses treated water from the STP for gardening purposes. The treated water from STP is stored in a 4000-litre tank and used for gardening purposes.</p> <p>Bilge Water</p> <p>DPT does not allow discharge of bilge water from vessels into the marine environment from the ships entering the berth area. As per MARPOL regulations, bilge water has to be discharged in open sea and not permitted near the shores. The oil content in the bilge water has to be reduced to 5ppm before discharge</p>	<p>associated with the storm water network.</p>	<p>Constructing storage tank for collection of rainwater from roof top and open areas and joining the existing stormwater drains with the tank.</p>
5	<p>Waste Management</p> <p>The client will avoid the generation of hazardous and non-hazardous waste materials. Where waste generation cannot be avoided, the client will reduce the generation of waste, and recover and reuse waste in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, the client will treat, destroy, or dispose of it in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. If the generated waste is considered hazardous, the client will adopt GIIP alternatives for its environmentally sound disposal while adhering to the limitations applicable to its transboundary movement.</p> <p>When hazardous waste disposal is conducted by third parties, the client will use contractors that are reputable</p>	<p><u>Hazardous Waste generation, handling, and disposal</u></p> <p>Based on the document review, it was found that DPT has obtained the authorisation for handling, storage, transportation, and disposal of hazardous waste from the Gujarat Pollution Control Board and the authorisation (vide letter no. AWH-110594 dated 08/12/2020) is valid till 21st July 2025. The authorization is for handling of 1125 MT of Used Oil (Schedule 1-5.1) and 3344.43 MT (Schedule 1-5.2) of Waste Residue Containing Oil.</p>	<p>As per the environmental Statement (Form V) and Annual Return for Hazardous waste (Form IV) submitted by DPT (vide letter no EG/WK/4751/Part (CCA Renewal)14 dated 30.04.2021), the total hazardous waste generated for the year 2020-21 was 9874.84 (used spent oil and Waste Residue Oil). This is found to have exceeded the stipulated quantity of 4469.43 MT of hazardous waste as given in the CCA. Since the CCA issued is a consolidated one for all dry cargo handling and liquid cargo handling, it cannot be estimated from Form IV if generation of hazardous waste has exceeded from KICT operation also.</p>	<p>KICT need to check with DPT to understand the estimated quantity of hazardous waste generation permitted for Berths 11 and 12, based on which KICT need to confirm if they comply with the stipulated quantity.</p>

S. N.	Aspects	Observations	Gaps	Recommendation
	and legitimate enterprises licensed by the relevant government regulatory agencies and obtain chain of custody documentation to the final destination.	During site assessment, it was found that waste oil and used oil were stored in drums and kept in open space adjoining to the DG Set area on paver blocks. Reportedly, this was the demarcated location for hazardous waste storage.	The hazardous waste storage area is not as per Hazardous Waste Management Rule. Moreover, storage over paver blocks leads to the risk of leaching of oil through the joints in case of accidental spillage.	KICT is recommended to store hazardous waste in an enclosed and restricted yard with compartments for different types of wastes, and on the paved and bunded surface with leachate collection drain and sump.
		The waste oil and oil contaminated cotton rags are disposed through an authorised recycler, M/s Shibl Lubricant, Surat, Gujarat who is authorised to undertake such activity through a CCA vide Consent order No. AWH-104123 valid till 30 th June 2024	It was found that the hazardous waste storage area was not segregated from other wastes generated during the process. Waste such as ropes and other scrap items were found lying unattended near to hazardous waste storage area.	KICT to ensure segregated storage for hazardous and non-hazardous waste.
		The berths 11 and 12 generates non-hazardous cotton waste from housekeeping and disposes the same through M/s Adarsh Scrap. During 2020-21, 2583 kgs of cotton rags were generated.	Reportedly, KICT disposes oil contaminated rags arising from maintenance activities, to M/s Shibl Lubricant, Surat. However, no document was made available to substantiate the same.	KICT need to furnish documentary evidence for disposal of oil contaminated rags to M/s Shibl Lubricant.
		<p>Dredged Materials</p> <p>Maintenance dredging is the responsibility of DPT. It was found that siltation rate at Kandla is very low. Regular checking is done, and dredging is done as per requirements. All dredged materials are handled by DPT.</p>		
		<p>Bio-medical Waste</p> <p>As per Rule 4-n of the Bio-Medical Waste Management Rules, 2016 (BMWR 2016), the Site needs to 'maintain and update on day to day basis the bio-medical waste management register'. Furthermore, the monthly records of bio-medical waste generation (generated in terms of</p>	No gaps	No recommendation

S. N.	Aspects	Observations	Gaps	Recommendation
		<p>Category and colour coding as specified in Schedule I of the BMWR 2016) need to be furnished on its website.</p> <p>The First Aid Centre has color-coded waste disposal bin to store biomedical waste like cotton, gloves, etc. Reportedly, expired medicines are returned to the vendors/medical stores from where the medicine is procured.</p> <p>Wastes such as mask, PPE kit, cottons, etc, is handed over to the DPT hospital for disposal. A handover registers for the same has been maintained on site.</p>		

4.4 IFC PS4: Community Health and Safety

S. N.	Aspects	Observations/ Gaps/ Risks	Gaps	Recommendation
1.	<p>Community Health and Safety <u>Infrastructure and Equipment Design and Safety</u> The client will design, construct, operate, and decommission the structural elements or components of the project in accordance with GIIP, taking into consideration safety risks to third parties or affected Communities. When new buildings and structures will be accessed by members of the public, the client will consider incremental risks of the public's potential exposures to operational accidents and/or natural hazards and be consistent with the principles of universal access.</p>	<p>As mentioned in the earlier section all settlements are beyond 10-km of the KICT site. Thus, there is practically no interaction with any outside community. Also, the site is a restricted area and no unauthorized persons are allowed inside. The community health and safety aspect are limited to the health and safety of its employee and contractor workers. However, the following measures are taken by KICT to ensure zero-incidents within the campus.</p> <ul style="list-style-type: none"> As indicated earlier, periodical examination such as load test of lifting of Cranes, Hydra, Hoists and their accessory gear are done. Load test of lifting appliances was last conducted on 18th April 2021, for hydra crane and loose gear inspection was conducted on 19th January 2021. <p>Fire Safety</p> <p>KICT terminal has obtained a fire safety certificate from the Inspectorate of Fire Service as per requirements. The certificate is valid till 19th August 2021.</p> <p>KICT premises is equipped with fire alarms located in strategic locations such as Terminal building, labour wash area and oil dispenser area. There are 53 fire extinguishers of ABC, CO2, CA and Foam types in 11 locations (sub-station, near hazardous containers storage area, Maintenance yard, Gate complex, terminal building, OHC etc.). There are also 67 fire hose reels, 46 numbers of underground yard hydrant and 56 numbers of above ground yard hydrant. A fire water tank of capacity 200000 litres has been constructed in the premise. All the fire-fighting equipment was verified during site visit.</p> <p>KICT undertakes monthly inspections of all fire equipment. The inspection is carried out by the EHS Department. Review of inspection documents reveal that all fire equipment is in good conditions.</p>	No gaps	No recommendation

S. N.	Aspects	Observations/ Gaps/ Risks	Gaps	Recommendation
		<p>KICT also carries out emergency mock drills (fire) quarterly. The total response time was recorded at 37 minutes for 'all clear' scenario.</p>		
2.	<p><u>Emergency Preparedness and Response</u> The client will also assist and collaborate with the Affected Communities, local government agencies, and other relevant parties, in their preparations to respond effectively to emergency situations, especially when their participation and collaboration are necessary to respond to such emergency situations. If local government agencies have little or no capacity to respond effectively, the client will play an active role in preparing for and responding to emergencies associated with the project. The client will document its emergency preparedness and response activities, resources, and responsibilities, and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties.</p>	<p>As indicated earlier, KICT has a documented Emergency Response Plan. The workers including security personnel are trained in line with the ERP. KICT conducts quarterly security mock drills for the different types of emergencies. Review of training documents indicated that security personnel are trained on different types of emergency response. Surprise Drills are also conducted by CISF and marine police to evaluate the level of preparedness of the KICT security system. So far three surprise drills were conducted by CISF. Joint security exercise with CISF were also conducted as and when required. It was conveyed that till date the KICT security has never failed in the evaluation. No separate drills are conducted with DPT. Refer Emergency Preparedness and Response under PS-1 for more details on specific Emergency Response Plans The Berths 11 and 12 are equipped with electronic surveillance with CCTV cameras. The site is also equipped with 2 emergency sirens. Security guards are also equipped with 74 VHF of which 28 base stations and 46 handheld walkies for internal communication.</p>	No gaps	No recommendation
3.	<p><u>Security Personnel</u> The client retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by its security arrangements to those within and outside the project site. In making such arrangements, the client will be guided by the principles of proportionality and good international practice in relation to hiring, rules of conduct, training,</p>	<p>KICT has developed and implementing a Security Management Plan as per ISO 28000: 2007 and KICT Security Management Policy. The Security Management Plan includes details on company policies and procedures relevant to security, security risk assessment and planning, incident reporting and responsibilities for supervision and control. In addition, a Security Manual (security operating procedures) is in place for detailed guidelines and methodology for security</p>	<p>Review of records and Security Training Calendar indicated that training is limited to emergency response, ISPS and general security duties. The security personnel are not provided training on Basic Human rights.</p>	<p>KICT is recommended to revise the training calendar for security personnel for inclusion of Human Right topics such as:</p> <ul style="list-style-type: none"> • Basic Human Rights • Proper conducts and ethics

S. N.	Aspects	Observations/ Gaps/ Risks	Gaps	Recommendation
	<p>equipping, and monitoring of such workers, and by applicable law. The client will make reasonable inquiries to ensure that those providing security are not implicated in past abuses; will train them adequately in the /use of force (and where applicable, firearms), and appropriate conduct toward workers and Affected Communities; and require them to act within the applicable law. The client will not sanction any use of force except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.</p>	<p>systems. The procedures work in tandem with other EHS management and operation procedures.</p> <p>KICT has also developed and implementing Port Facility Security Plan (PFSP) with the objective to protect the port facility, container units, workers within the port from risk of any security incident. The plan includes details on physical security, approach, and security systems. Details designed on the security arrangement and deployment is mentioned in the facility plan. The PFSP is being audited once a year by the Port Security Committee.</p> <p>KICT has a Port Security Committee, an internal security committee comprising of 6 team members of all concerned department to review the security activities, performance and incidents as per the ISPS code. The committee meets quarterly.</p> <p>KICT has in place procedures for dealing with visitors requiring access to port facility. Prior to entry to KICT terminal, photo pass ID card (presently, only ID pass without photo is being issued due to COVID-19) is made on production of government approved ID card.</p> <p>KICT has installed emergency sirens in two location with a range of 50m radius. Other security equipment such as Spike Buster, Vehicle Search Trolley, Walkie talkie sets, Alcohol detector, Frisking cabin (Frame Metal Detector), Electric Motor handling Iron gate, and Night Vision Binocular are also provided.</p> <p>Internal audits for security are conducted twice a year and external audits are carried out on a need basis for verification to ISO 28000 standard.</p> <p>About 57 contractual staff are deployed for providing security services to the terminal. Of these 57 guards, one is a female guard. KICT has also engaged 6 Ex-Army Security officers who are directly employed by KICT. None of the security personnel possess firearms.</p>		

S. N.	Aspects	Observations/ Gaps/ Risks	Gaps	Recommendation
		<p>KICT has in place procedures for hiring of security personnel which include screening of the background of applicants to identify any past involvement in human rights violations.</p> <p>As per consultation, all security personnel engaged on site must undergo background checks/police verification prior to engagement.</p> <p>Consultation with security personnel and review of training records reveal that the security personnel are provided trainings on topics such as ISPS, ERP, Bomb Threat received by Telephone, Forcible Entry of Vehicle, General Guards Duties and COVID-19 awareness. The training programs were conducted based on the quarterly security training calendar.</p>		

4.5 Project Categorisation

The ESDD ascribes to the IFC Sustainability Framework (2012), which requires projects to be categorized according to the magnitude of potential impacts as Category A, B or C, which respectively represent high, medium and low levels of risks.

IFC E&S	Definition
Category A	Projects with potential significant adverse social or environmental impacts that are diverse, irreversible or unprecedented;
Category B	Projects with potential limited adverse social or environmental impacts that are few in numbers, site-specific, largely reversible, and readily addressed through mitigation measures;
Category C	Projects with minimal or no adverse social or environmental impacts.

AECOM has considered the following issues and observations for the project categorization:

- Applicability and compliance with regard to regulatory requirements for pollution control and environmental safeguards (air emissions, discharges, noise generation, storage of chemicals, etc.). No major issues with regards to permits and regulatory compliance.
- Key risks and impacts will be limited within existing premises and the project is not expected to result in any new significant long-term impacts
- The project has no interaction with local communities. No land acquisition and impact due to involuntary resettlement on account of the project.
- Localised issues related to Occupational Health and Safety of workers were observed. These potential impacts can be managed by implementing adequate mitigation measures.

On the basis of the above points, the project may be categorized as **Category B**.

5. Corrective Action Plan

The present section delineates the compliance status of gaps identified in the gap assessment as type of issues. This section also summarizes the key recommendations in the form of a Corrective Action Plan (CAP) that has emerged from the independent review. The CAP outlines an overview of corrective actions and recommendations for the Company's consideration along with an indicative timeframe of completion.

Table 5-1 Corrective Action Plan

Sl. No	Recommendation/Corrective Action Plan	Reference Point	Responsibility	Measurable Outcome/ Documentation	Timeline
1.	Develop a Stakeholder Engagement Plan (SEP) to ensure effective engagement with stakeholders on E&S performance and to maintain a record of stakeholder engagement throughout the life of the project.	Refer Point 1 and 8 of Table 4.1 Performance Standard 1	KICT HR Department	<ul style="list-style-type: none"> • SEP compliant with requirements of the IFC PS and signed by senior management. • Stakeholder Analysis and Engagement Planning Procedure • Records related to stakeholder engagement sessions 	3 Months
2.	Formulate a CSR policy to ensure that all CSR plan so developed should be in line with the company policy.	Refer Point 2 of Table 4.1 Performance Standard 1	KICT HR Department	Approved CSR Policy	3 Months
3.	Upgrade the Legal Register capturing all applicable EHS and Labour requirements for its operations along with a provision of setting a compliance management calendar and periodic compliance status tracking mechanism.	Refer Point 3 of Table 4.1 Performance Standard 1	KICT EHS Department	Formalised and controlled Legal Register with up-to-date Compliance calendar	3 Months
4.	Install Public display environmental information board showing emissions, water consumption and wastewater generation and hazardous waste generation.	Refer Point 7 of Table 4.1 Performance Standard 1	KICT EHS Department	Board installed at gate	1 month
5.	Develop and implement a procedure for grievance mechanism for local communities.	Refer Point 9 of Table 4.1 Performance Standard 1	KICT EHS Department	Approved Grievance Mechanism, Grievance Redressal Register	3 Months
6.	Preparation of Construction Environmental Management Plan (CEMP) for additional land of 51,600 sq.m area to be taken on lease from DPT. The EPC contractor will be contractually required to prepare and implement the CEMP for yard development aligned with IFC Performance	Refer Point 4 of Table 4.1 Performance Standard 1	EPC Contractor, KICT EHS Department	EHS Management Plan for Yard Development	3 months or prior to commencement of construction activities whichever is earlier.

Sl. No	Recommendation/Corrective Action Plan	Reference Point	Responsibility	Measurable Outcome/ Documentation	Timeline
	Standards and IMS manual. The Plan will be validated by KICT				
7.	Develop a Contractor Management Plan for ensuring contractors compliance to EHS requirement defining measures and timelines to improve, manage and monitor performance according to applicable standards This will include establishing policies and procedures for managing and monitoring the performance of contractors, and incorporation of such requirements in contractual agreements	Refer Point 7 of Table 4.1 and point 10 of Table 4.2 Performance Standard 2	KICT HR Department KICT EHS Department	Approved Contractor Management Plan	3 Months
8.	Update the existing Grievance Redressal Policy for KICT employee and include grievance mechanism for Contractor Workers.	Refer Point 9 of Table 4.1 Performance Standard 2	KICT HR Department	Approved External Communications and Grievance Redressal Mechanisms Policy for contractor workers and employees z	3 months
9.	Update the existing HR policy to include the Freedom of Association/ Collective Bargaining Policy	Refer Point 1 of Table 4.2 Performance Standard 2	KICT HR Department	Revised HR Policy	3 Months
10.	Revise the existing Retrenchment Plan in line with IFC Good industry Practice-Managing Retrenchment.	Refer Point 1 of Table 4.2 and point 5 of Table 4.2 Performance Standard 2	KICT HR Department	Revised Retrenchment Plan	3 Months
11.	Contractors to issue appointment letter to workers. The appointment letters should include all terms of employment and benefits.	Refer Point 2 of Table 4.2 Performance Standard 2	KICT Contractors	Appointment Letter	1 month
12.	Develop a mechanism as per requirement of Minimum Wages Act to pay overtime to KICT employees engaged in 12-hours shifts. This would require updating the HR Policy in case KICT engage employees for more than 9 hrs a day and 48 hrs a week in future. KICT's concerned Department has taken cognizance of this issue	Refer Point 2 of Table 4.2 Performance Standard 2	KICT HR Department	Revised HR Policy upon completion of detail scrutiny by KICT's HR department and intimation to employees of any such revisions.	1 Month

Sl. No	Recommendation/Corrective Action Plan	Reference Point	Responsibility	Measurable Outcome/ Documentation	Timeline
	and has agreed to take necessary actions immediately to resolve the issue.				
13.	Develop and implement action plan/ measures to address the identified variances with respect to applicable labour law provisions including those pertaining to working hours, weekly offs, overtime, maintenance of records and display of provisions of applicable labor laws; and (b) implement appropriate process review and audit procedures to periodically obtain assurance on contractor compliance with applicable labor laws)	Refer Point 2 of Table 4.2 Performance Standard 2	KICT HR Department	Improved mechanism for recording time & attendance for workers	1 Month
14.	Overtime hour and payment calculations are to be recorded in Form B	Refer Point 2 of Table 4.2 Performance Standard 2	KICT HR Department	Overtime hours work and payment will be properly filled in column designated for overtime in Form B.	1 month
15.	Installation of display boards declaring the site as "Child Labour Free".	Refer Point 7 of Table 4.2 Performance Standard 2	KICT HR Department	Display Board at the Gate and within Premises	1 month
16.	KICT is recommended to carry out all sample analysis including drinking water quality from NABL Accredited Laboratory	Refer Point 9 of Table 4.2 Performance Standard 2	KICT EHS Department	NABL Certificate of laboratory	1 month
17.	Installation of proper height stacks for DG Sets	Refer Point 4 of Table 4.3 Performance Standard 3	KICT EHS Department	Proper height stacks installed	3 months
18.	Construct storage tank for collection of rainwater from roof top and open areas and joining the existing stormwater drains with the tank.	Refer Point 4 of Table 4.3 Performance Standard 3	KICT EHS Department	Water pipelines and rainwater storage tanks constructed	12 months
19.	Construct a covered structure with leachate collection drain and impervious surface for storage of hazardous wastes. Proper segregated storage for hazardous and non-hazardous waste	Refer Point 5 of Table 4.3 Performance Standard 3	KICT EHS Department	Designated Storage areas have to be put under covered sheds with paved surface and dyke walls for all fresh and used oil drums.	1 month
20.	KICT need to check with DPT to understand the estimated quantity of hazardous waste generation	Refer Point 5 of Table 4.3 Performance Standard 3	KICT EHS Department	Evidence of communication with DPT	1 month

Sl. No	Recommendation/Corrective Action Plan	Reference Point	Responsibility	Measurable Outcome/ Documentation	Timeline
	permitted for berth 11 and 12, based on which KICT need to confirm if they comply with the stipulated quantity.				
21.	KICT is recommended to submit an official query to DPT to understand if EC will be triggered for the proposed capacity augmentation, or the same is already covered under the existing EC. The communication should also include request to DPT to obtain the required EC if the same is deemed triggered	Refer Sl.No. 1 of Section 3.1	KICT EHS Department	Evidence of communication with DPT	1 month

Appendix A : List of Reviewed Documents

- Environment Clearances and Combined Consent Authorisation
- Integrated Management System
- Emergency Response Plan and Procedures
- Quality Health Safety Policies
- Security Management Plan
- Legal Register
- Hazard Impact Risk Assessment
- Waste Record
- Permit and Licenses including labour licence and registration
- Drinking Report Analysis
- Environment Monitoring Report
- HR Policies and Procedures
- Standard Operating Procedures
- Health and Safety training record
- Safety Induction training record
- Sample copies of contractor Agreement
- Sample copies of KICT safety committee Meeting Minutes
- Sample Copies of Contract Meeting Minutes
- Inspection checklist
- Audit Reports
- Wage Register
- Attendance Register for KICT employee and Contractor labour
- Workmen compensation Insurance Policy
- Fire Certificate and List of firefighting equipment
- Annual and Periodical Inspection Reports of Cranes, loose gear etc

Appendix B Stakeholder Consultation

B.1 List of Stakeholders Interviewed/Consulted

Date	Location	Participants
2nd to 4th June 2021	Video Conference	Ms. Poonam Raisinghani-Head Finance and Account Mr. Aditya Abhishek-QHS Head, KICT Mr. Uttam Chudasma-HR Manager Mr. Digvijaysingh Jadeja-Safety Officer
	Video Conference	Mr. Akhileh Singh- Security Officer Mr. Ramesh Rai-Z-Plus Security Representative Ms Poonam-Lady Security Guard Manoj Bharghav-Paramedic Staff Mr Aslam-Contractor Representative Sailani & Co Mr Salim-Contractor Representative-Mas Marine Mr Rinku Ali- Senior accountant-Aarcellor staffing
19.06.2021	KICT Office, Kandla	Mr. Aditya Abhishek-QHS Head, KICT Mr. Uttam Chudasma-HR Manager Mr. Digvijaysingh Jadeja-Safety Officer Mr. Rajesh Shah-General Manager Electrical Mr. Suraj Singh-Contract Workers Mr. Damodar Parida- Contract Workers Mr. Akhileh Singh- Security Officer Workers from AP Logistics and Z-plus Security

Appendix C QEHS Policy



QUALITY, HEALTH, SAFETY AND ENVIRONMENT POLICY

COMMITMENT:

The management of ICT IPL shall pursue Excellence in our Integrated Terminal Operations & Services to the Internal and External stakeholders are committed to:

- ◆ Providing efficient and qualitative services to Customers by understanding the organizational context to mitigate the risks associated with operations and business.
- ◆ Meeting Customer expectation & satisfaction.
- ◆ Effective application of Quality, Environment, Occupational Health & Safety Management Systems for continual improvement with respect to service delivery.
- ◆ Complying with all applicable legal, statutory and regulatory requirements.
- ◆ Ensuring communication and understanding of Quality, Environment, Occupational, Health & Safety Policy within the organization and other interested parties.
- ◆ Achieve total customer satisfaction and if possible Exceed the needs and expectation of our customers by providing efficient time bound and cost-effective services.
- ◆ Ensure Prevention of Injury and Ill health among all persons working under our control and Prevent Pollution in all our Operations.
- ◆ Establish sound Quality, Environmental Occupational Health & Safety Objectives and Targets to control risks, conserve resources, minimize wastes and achieve customer delight.
- ◆ Identifying and evaluating all OH&S hazards in existing operations and future projects and establishing controls to manage risk.
- ◆ Promoting QEHS awareness among all employees including contract workers throughout the organization.
- ◆ Identifying and evaluating all environmental aspects of its existing operations and future projects and establishing controls to limit the impact on environment.

Vision:

Market leader in every segment of logistics & shipping support service with a social conscience.

Mr. K. K. Krishnadas
President & COO
ICT IPL

Date:23/11/2019

Appendix D Photolog



Photo 1. Stackyard



Photo 2. RMQC carrying out loading and unloading of containers from Vessel

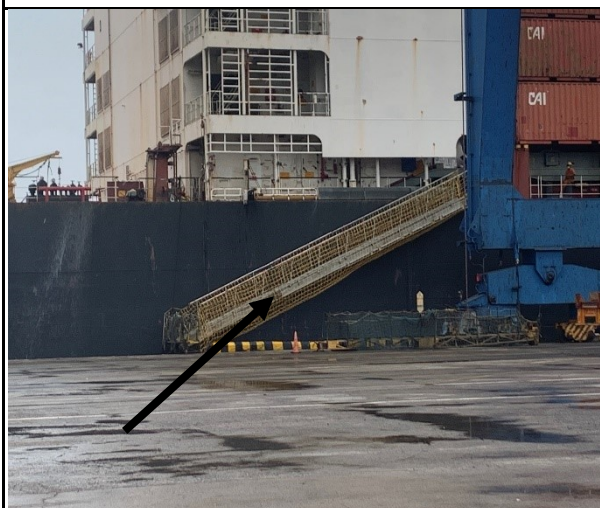


Photo 3. Gangways with Safety Net



Photo 4. Man-cage



Photo 5. Hazardous Container Yard



Photo 6. Stackyard



Photo 7. Pedestrian Walkways



Photo 8. Terminal Building



Photo 9. ITV



Photo 10. Crane Maintenance Area



Photo 11. Electric Waste observed near Toilet



Photo 12. Plastic waste observed in Oil Separator Pit



Photo 13. Labour Restroom with sleeping facility



Photo 14. Restroom



Photo 15. Canteen Facility for KICT employee



Photo 16. Canteen Facility for Contract Workers



Photo 17. Washing Area

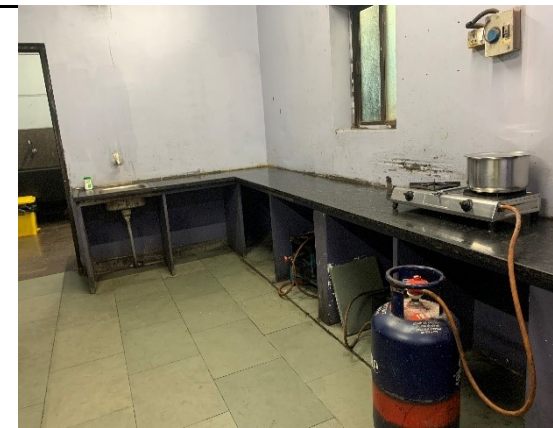


Photo 18. Canteen Area



Photo 19. Feedback and Complaint Box located in Restroom Area



Photo 20. Drinking water Point



Photo 21. D.G Set



Photo 22. Fire Extinguisher with tags

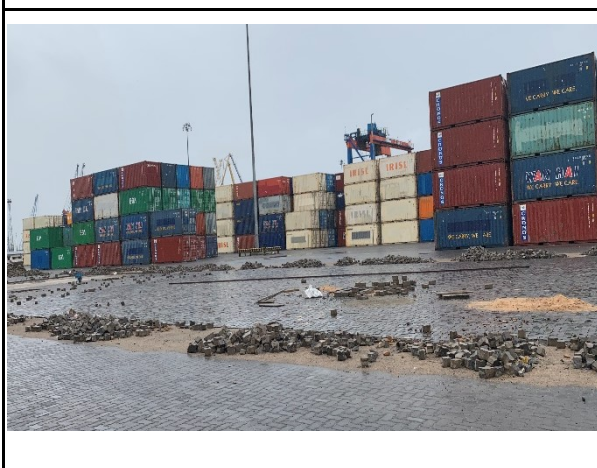


Photo 23. On-going Maintenance Work (laying of paver block)



Photo 24. Sewage Treatment Plant 5 KLD



Photo 25. Green cover in KICT premises



Photo 26. Occupational Health Centre



Photo 27. Colour Coded Bin in OHC

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