Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
India	SOUTH ASIA	P175728	
Project Name	Gujarat Resilient Cities Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	10/11/2021	1/14/2022
Borrower(s)	Implementing Agency(ies)		
Urban Development and Urban Housing Department	Ahmedabad Minicipal Corporation, Gujarat Urban Development Company, Ahmedabad Municipal Corporation		

Proposed Development Objective

To develop resilient and sustainable urban service delivery and financial systems in Ahmedabad

Financing (in USD Million)	Amount
Total Project Cost	400.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed program will provide comprehensive support to AMC towards: (1) improving service levels along with enhanced efficiency, resilience and sustainability – focusing on waste-water management & recycling and reuse, storm water drainage and urban health services, (2) improving financial performance of AMC – focusing on improving municipal revenues, leveraging land-based financing and developing a robust capital investment planning, financing and budgeting system, and (3) improving organizational capacity for improved infrastructure planning, service delivery and sustainable O&M. In addition, the program will also provide technical support to GUDC at state level for

developing and implementing a “Center of Excellence” capacity building programme with GUDI, which will incubate and export India-appropriate urban development and management “best practices” and lessons for other emerging cities in Gujarat based on Ahmedabad, Surat and relevant global experience.

In waste-water management services, the focus would be on (i) expanding and rehabilitating the sewerage network and treatment infrastructure to ensure that wastewater is collected and treated as per new national discharge standards, and (ii) developing treatment infrastructure for industrial reuse of treated wastewater to achieve the targets set out in state policy for reuse of treated wastewater. In the storm water drainage, the focus would be on expanding and rehabilitating the drainage network in the city for improving the resilience and water resource management, with a priority focus on reviving the natural drainage system of the city that includes major canals running across the city through coordinated technical solutions to address water contamination issues. In the urban health services, the focus would be on (i) developing urban primary health care centers (UPHCs) and comprehensive healthcare centers (CHCs) to expand access to primary and secondary healthcare services, (ii) developing a robust disease surveillance system in AMC, and (iii) improve quality of care in UPHCs and CHCs by supporting the activities to seek national accreditations.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Gujarat State, in the North-Western coast of India, is among its most urbanized states with a strong industrial base. Located between 22°55' & 23°08' North latitudes and 72°30' & 72°42' East longitudes at an elevation of 53 meters above MSL is its largest city, Ahmedabad contributing about 60% of the State's productivity and well known for its architecture, and textile industry. With an estimated population of 7.3m residing in the municipal area spread over 505 sq. km, under the jurisdiction of Ahmedabad Municipal Corporation (AMC), it is the country’s seventh-largest metropolis. The city is divided into seven administrative zones - Central, East, West, North, South, southwest, and northwest; and depicts a concentric compact city around the Sabarmati River, with a density of around 14,450 people/sq.km. The city could be segmented as a) the ‘walled’ city (within the fort walls) – old city of Ahmedabad in the central area to the east of River Sabarmati; b) industrial and residential localities to the Eastern peripheral areas of the Old City; and c) plotted residential colonies and institutional areas in the ‘new city’ to the west of the old city across Sabarmati.

Ahmedabad is sited in a dry sandy area of moderately deep, loamy textured soil; with plain topography, except the small hills of Taltej and Jodhpur Tekhra. River Sabarmati, the most important water body in the region, bifurcates Ahmedabad into the western and the eastern parts, connected via five bridges. Climate is dry, with summer (march to June; with heat waves), monsoon (southwesterly from mid-June to mid-September), and winter (October to February; with chills) seasons. The Khari River runs almost parallel to the Sabarmati towards the east, beyond the city limits. One of the oldest irrigation schemes of Gujarat ‘Kharicut canal scheme’ passes through the eastern part of the city, also serving as a stormwater drain during monsoon, draining into Khari River. The Kankaria, Vastrapur, Thaltej, and Chandola are among the many important ponds/lakes in the city. Thol Lake Sanctuary is at around 27Km from the city. There are many city-level gardens, parks, ponds in Ahmedabad. Gujarat is located in the “Himalayan Collision Zone” with Ahmedabad in a severe earthquake intensity zone - Seismic Zone III.

The city has 54 heritage monuments (many dating back to the 15th century) protected by the Archaeological Survey of India - 32 in the Central Zone including fort walls and gates, traditional houses ('pols') and their features, public wells, mosques, tombs, and Hindu and Jain temples of later periods. With these, the historic walled city of Ahmedabad appeared in the UNESCO's World Heritage City list of 2017. Proposed infrastructure developments may be in different parts of the city. Proposed sewerage and drainage networks will be along the main city roads, some in the very congested central city. Some of the sites may have nearby sensitive land uses, receptors, heritage sites, and natural habitats (for example Sewage Treatment Plants (STPs) near River Sabarmati or lakes, networks across the River, or near heritage precincts).

Due to vibrant economic activities, the city attracts a significant number of migrants from within the state, adjoining ones as well as other parts of the country. Nearly 695,000 or 12.4 percent of the population comprises of people who have come to the city from outside the state for employment. The total scheduled caste (SC) and scheduled tribe (ST) population of the city as per Census 2011 was 11.85 percent, of which SCs comprised 10.5 percent or 594,000, making them the second-largest vulnerable population of the city. The urban poverty rate of the city has declined from 28 percent in 1993–1994 to 10 percent in 2011–2012. However, there are still challenges related to lack of access to sanitation, improved water, and electricity. About 34 percent of the residents live in slums or chawls (tenements for industrial workers).

D. 2. Borrower's Institutional Capacity

Gujarat Government's Urban Development and Urban Housing Department (UD&UHD) is the nodal department for this program at the state level. The AMC is the largest municipal corporation of Gujarat and it implements schemes and programs for urban development infrastructure, provides municipal services, other public services including entitlements and benefits as part of the social safety net in the city. Both the agencies have previous experience of working on investment projects and similar infrastructure development as proposed under the current operation. At the city level, ensuring E&S measures will be the responsibility of the AMC. AMC will implement the city level activities and Gujarat Urban Development Company (GUDC) will implement the state-level activities. AMC will take up the overall program implementation, monitoring, reporting, and coordination role, and will coordinate with GUDC as necessary. A dedicated Program Implementation Unit (PIU) has been established in AMC with a Program Director and a Deputy Program Director. The PIU will leverage the existing capacity of the AMC and hire additional experts and consultants.

Ahmedabad Municipal Corporation (AMC) and Gujarat Urban Development Corporation (GUDC) does not have prior experience of working on World Bank-funded project, though other Government Agencies and Departments (such as Disaster Management Authority), at the State level have experience with Bank-funded projects and managing E&S risks using the environmental and social assessment instruments developed for their respective projects.

AMC has in-house engineers / environmental engineers in its Water Resources Department which manages Sewerage and Storm Water / Drainage projects. They manage environmental aspects of existing schemes including managing consents from the pollution control board and reviews the environmental performance of the operating contractors. Health Department which will be coordinating public health-related interventions is headed by medical officers; and have health officers, epidemiologists, and health supervisors. The capacity and tools of the implementing agencies/departments to implement and monitor E&S aspects and Occupational and Community Health and Safety (OCHS) will be reviewed comprehensively during the preparation stage. The composition of the implementing departments and PIU at the State and City levels and capacity assessment to identify required institutional arrangements for E&S management of all subproject activities in different sectors (including environmental and social

specialists, Biosafety/Health experts) and reporting will be undertaken as part of project preparation. The findings will be incorporated in the ESMF and the ESCP.

The country has a robust legal and regulatory environment that takes care of potential environmental and social risks and impacts of proposed developments including Environmental Protection, Water, Air, Noise Pollution, Management of Wastes, and Occupational Health and Safety.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

Environmental risks are rated as 'Substantial'. The project will improve the overall health of the inhabitants, environmental improvement, and resilience of Ahmedabad city by improving stormwater drainage, sewerage systems, public health systems (investing in Intensive Care Units (ICUs) and public health labs, additional clinical service providers and field staff, strengthening systems for disease surveillance), providing technical support for municipal revenue mobilization, developing a GIS-based real-estate asset inventory management system, appropriate tariff strategy for core urban services, technical support for land-based financing.

Civil works include up-gradation of existing STPs and construction of new ones and support infrastructure, canal improvements, rehabilitation of existing networks, expanding sewerage and drainage networks, establishing new health centers, laboratories, and other support facilities (cold chain). Other activities with limited risks and impacts include developing GIS-based asset management inventory, support to GUDC/GUDI, and technical support. Any works on international waterways will be ineligible under the project.

Expected impacts due to construction and upgradation of sewerage and drainage networks, treatment plants and improving health systems if facilities are not properly planned, designed, and managed; include (i) impacts on water environment of the water body receiving treated sewage / waste water or near construction / storage areas, (ii) increased possibilities for pedestrian-vehicular conflicts during utility shifting and laying of networks mainly through congested inner city areas, (iii) noise and vibration due to construction activities disturbing surrounding structures including heritage structures in the vicinity; (iv) noise, light, water, dust, air, land pollution and disturbance to fauna/flora and nearby communities due to construction, activities, usage, O&M activities; (v) occupational and community health and safety (OCHS) risks on workers (including due to non-availability / lack of use of PPEs at construction areas, in laboratories & public health systems) and communities, (vi) public inconvenience due to shifting of utilities, material transport, storage, construction and maintenance of proposed infrastructure, (vii) liquid and solid wastes during network laying, upgradation and construction of treatment plants and operations, construction and demolition waste which may include existing asbestos, batteries, hazardous wastes and e-wastes which need to be disposed carefully, (viii) sludge, other wastes and effluents/backwash water during O&M stages, (ix) labor camp related pollution and burden on shared resources; (x) disturbances to activity spaces, parks, open spaces, natural habitats in the vicinity of work areas due to storage of materials and parking and movement of laborers, and construction vehicles, (xi) biomedical (incl. Personnel Protective Equipment), solid, hazardous and e-wastes, biosafety, during construction and O&M stages of proposed public health / COVID 19 response facilities, ICUs and laboratories.

Proposed activities will involve several interdependent components, and all may not be financed under the project. Hence, the impacts of associated facilities are relevant and will be identified during the design stage.

These potential risks can be avoided, mitigated, or minimized through good planning and engineering design. Considering that the impacts are reversible, localized, and temporary, the environmental risk of the project is considered as "substantial". The actual nature and magnitude of impacts and risks will be assessed and described in the Appraisal stage ESRS when there is more clarity on the type, and locations of proposed interventions and capacities to manage these.

Social Risk Rating Substantial

At this stage, the social risk rating of the project is classified as “Substantial” based on the planned project activities throughout the city. Under Activity 1, the project plans to support AMC in improving infrastructure and service levels of waste-water management services, stormwater drainage and water resource improvement, and urban health services. Financial support will be provided to AMC to undertake critical and priority investments for (i) expansion and up-gradation of waste-water treatment facilities in compliance with the new national waste-water treatment and discharge standards, (ii) rehabilitation and expansion of sewerage network in the core city area and the newly-added peripheral areas along with SCADA monitoring system, (iii) waste-water recycling and industrial reuse to mitigate the fresh-water demand for industrial usage and achieve the target of 70% reuse as per state’s waste-water recycling and reuse policy, (iv) rehabilitation and expansion of stormwater drainage as well as revival of the critical natural drains of the city to prevent urban flooding problems and water resource conservation, (v) strengthening of health services for local-level pandemic response, (vi) building a resilient urban health system through improved access and quality of primary healthcare services and strengthened disease surveillance system in the city.

These infrastructure development work in densely-populated urban areas of Ahemdabad will require land that will need to be permanently acquired or temporarily required for the project. The activities will adversely affect the livelihoods of the urban poor as well as community safety during the construction phase. The AMC will need to conduct an assessment of the land parcel required for setting up the wastewater/ sewerage treatment plants(WWTP/ STP)- their numbers and locations across the city, land availability with the municipal corporation or other government entities (public land) for constructing these utilities, the estimated length of sewerage network proposed to be rehabilitated or expanded through large scale excavation and earthwork across the city and the scale of the population likely to be impacted (temporarily or permanently) due to this network improvement.

The “Substantial” risk rating is also based on a few other factors- a) influx of non-local labor at the construction sites, especially concentration of labor at the WWTP/ STP sites and their impacts on neighboring communities including gender-based violence (GBV), sexual exploitation and abuse and sexual harassment (SEA/SH), b) economic and physical displacement of non- titleholders (squatters and encroachers who occupy stretches of public land/RoW) even if no land acquisition is involved, c) Upgradation of sewerage networks, especially in the congested city area may involve manual scavenging, which poses severe health risks for the municipal workers, d) septage outflow and disposal of sludge is usually at locations that are adjacent to habitations of the poorest and most marginalized communities, impacting their safety and well-being and e) equitable access to health services.

In short, the key social risks are related to land acquisition, potential displacement of vulnerable populations in the project intervention areas, community health and safety (including SEA/SH due to potential labor influx and the

project being prepared/implemented in a COVID environment) and potential impacts on cultural heritage given the state includes UNESCO heritage sites.

This risk rating will be further revisited and reviewed during the preparation stage as investments become clearer and risks are comprehensively assessed.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project will provide improved sewerage, stormwater drainage, and public health services for the city of Ahmedabad which in turn will have long term positive effects on health through the reduction of incidence of water-borne diseases and reduced health expenditure, especially for the urban poor; resource conservation through recycling/reuse of treated water; and resilience of the city to disaster/climate events like floods.

Environmental, OCHS risks, and impacts associated with the above activities during construction and operation stages include (i) wastes (Construction/Demolition, Solid Wastes (incl. Plastics), Hazardous, e-wastes), products (eg: treated water), and byproducts (eg: Sludge) while upgrading existing STPs, and constructing and operating STPs, drainage and sewerage networks, support facilities, (ii) small quantities of biomedical, hazardous, and solid wastes, biosafety and infection control related risks from proposed improvements in public health facilities; (iii) disturbance (eg: traffic disruption, vibration, noise) and health and safety impacts to workers and communities, (iv) air emissions including Green House Gases and dust, and (v) high use of energy and resources. These potential risks can be avoided, minimized, mitigated, or managed through good planning, engineering design, and incorporation of good practices. The actual nature and magnitude of impacts and risks will be described and assessed in Appraisal stage ESRS when there is more clarity on the proposed interventions.

The project activities will also have adverse social impacts due to potential land acquisition for construction of drainage and sewerage network, labor influx, etc. These adverse effects will be more severe for vulnerable and marginalized groups. AMC in co-ordination with GUDC will prepare the Environmental and Social Management Framework (ESMF) for managing E&S risks for the whole project. Based on an initial assessment of the land requirements, it may also need to develop a Resettlement Policy Framework (RPF). The ESMF will further inform the preparation and implementation of sub-project level Environmental and Social Impact Assessments (ESIAs) / Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAP). Additional instruments to be developed by the borrower as part of preparation will include Stakeholder Engagement Plan (SEP), Labor Management Plan (LMP) and gender-based violence (GBV), and sexual exploitation and abuse (SEA) Action Plan.

As part of developing the ESIA and ESMF, the vulnerable and disadvantaged households will be identified and measures will be proposed in the ESIA on how adverse social impacts on these constituencies will be managed and mitigated. These instruments will also propose how these groups will benefit from improved sewerage networks and wastewater management, better functioning stormwater drainage networks, and improved water resource management apart from improving urban health services through disease surveillance and pandemic management.

All possible social impacts will be assessed by the ESIAs and specific mitigation measures will be proposed in the ESMPs that will further inform the project design during the preparation stage. The project will also support filling the gender gaps in the workforce of the AMC.

An initial risk screening during the ESIA and ESMF preparation will help assess the land requirements of the project, their associated risks, scale and magnitude of impact, and the borrower's ability to manage these land-related impacts. RPF will also be prepared to address adverse land-related impacts.

The risk screening mentioned above will also help in assessing the presence of any associated facilities that may have a bearing on the current investments. Guidance under the ESF (using the 3 criteria for judging associated facilities) will be used to identify such facilities.

The risks can be managed through (a) avoiding impacts on sensitive habitats and receptors through screening and exclusion, (b) proper planning and design of treatment plants, networks, and public health systems (while preparing DPRs); and (c) developing the ESMF and capacities in the implementing agencies to plan, avoid, minimize and mitigate E&S risks during sub-project planning, approval implementation, and management process.

During the preparation stage, the borrower will prepare an ESMF before appraisal based on-site and desk-based reviews, and stakeholder consultations (in virtual mode, in consideration of the COVID 19 restrictions); based on which, identify, assess and plan the management of the E&S risks/impacts that are likely to arise. An evaluation of the extent and scope of sub-project activities, locations, E&S risks, and impacts on and capacities of the implementing agency/ies to manage these will be undertaken. This will help in (a) understanding the possible risks and impacts envisaged from project activities, b) reviewing existing national/state/local level regulations, requirements under ESF, EHS and GIIP, and gaps; (c) arriving at mechanisms to avoid impacts, and reduce, manage and mitigate risks; d) evaluating institutional capacities and resources required for environmental management applying the ESF and applicable ESSs. ESMF will include procedures for undertaking E&S screening and exclusion criteria, guidance for incorporating best practices in design, identification of alternatives, guidance on sub-project level ESIAs (with ESMPs) (including required studies, modeling, and to assess and manage cumulative risks if any) while preparing DPRs/Feasibility studies, approval processes and resources, training/capacity building, schedule and arrangements to implement mitigation measures and best practices. ESMF will also include a generic Environmental and Social Management Plan (ESMP) and environmental best practices. It will also guide the ESIA required for hospital infrastructure like ICUs proposed as part of public health improvements (including biosafety requirements and biomedical waste management plans), and Environmental Health Risk Management Plans (EHRMPs) for Clinics/ Health Centers and public health laboratory facilities (depending on biosafety levels which are expected to be known by appraisal). The Environmental, Health, and Safety &Social (EHSS) audit will be needed for existing treatment facilities or public health systems that are proposed for up-gradation under the project.

The project’s Environmental and Social Commitment Plan (ESCP) will specify the requirement for the Borrower to implement the ESMF, undertake sub-project level impacts assessment, and prepare their mitigation and management plans for implementation during the project cycle. All assessments and their recommended mitigation actions (including completion of resettlement and disbursement of compensation) will need to be completed before the commencement of physical /civil works. For this, the Borrower will need to ensure that all required mitigation

and management measures expected to be undertaken by the contractors as part of the ESMF appropriately are included in standard bid documents and implemented.

Apart from ESCP, ESMF and sub-project-specific documents (depending on procedures outlined in ESMF) ESIAs/ESMPs, other documents such as SEP, LMP, RPF/RAPs, EHRMPs shall be prepared, cleared by the Bank and disclosed by the Client before project appraisal and/or during the implementation of the project.

The Terms of Reference (ToRs) for TAs will incorporate the need to follow ESMF and guidance on considering E&S aspects and best environmental practices comprehensively across the TA. The PIU/s will develop the required capacities to manage environmental aspects to prepare and manage project activities and proposed TAs using the ESMF.

Areas where "Use of Borrower Framework" is being considered:

The project will apply the Bank's Environmental and Social Framework (ESF) and associated Environmental and Social Standards (ESSs) in addition to regulations at the National and State levels related to environment and social aspects. Borrower frameworks will not be pursued for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Investments related to expanded sewerage networks, improved wastewater and water resource management, and urban health services through improved disease surveillance and pandemic management are expected to have city-wide coverage. As per the initial investment plan, this will entail the creation of an expanded sewerage network, setting up of intermediate pumping stations and sewerage treatment plants complete with facilities for sludge management and disposal, decongestion, and revamping of the stormwater drainage network of the city for the conveyance of precipitation/ run-off, with least impact on the citizens. To this extent, almost all the localities and social groups/ communities are expected to be impacted.

Among those directly impacted and most vulnerable to adverse impacts will be a) hawkers/street vendors, encroachers/ squatters living along the sewerage alignments, b) migrants, poor, women-headed households, SC/ ST communities who usually reside in slums or unplanned settlements located in hazard-prone areas (like upon stormwater drains /run-off channels), c) owners whose land is acquired and those on lands adjacent to wastewater/ sewerage treatment plants, d) consumer households and resident welfare associations.

Apart from these the other stakeholders would include commercial establishments involved in water recycling and using retreated water, service providers/ duty bearers belonging to the AMC and GUDC, elected representatives; other line agencies within the AMC. Gujarat also has a very vibrant and active civil society movement, therefore the CSOs, as well as media groups (print, electronic, social), will also be engaged to seek inputs for the project.

ESS10 requires the Borrower to design an inclusive engagement process for the likely project stakeholders and will be expected to prepare a comprehensive Stakeholder Engagement Plan (SEP) to map all the key stakeholders, the requirements for their engagement, their own engagement needs and expectations, and how they need to be engaged for seeking feedback and suggestions through the project cycle. The SEP will also spell out the stakeholder

specific engagement strategies proposed to be deployed and how their suggestions and feedback will be looped in to inform the project design and implementation strategies.

Special attention will be paid in the SEP to engage with particularly vulnerable and disadvantaged constituencies like urban poor, migrants, single women/ women-headed households, socially marginalized communities (SC/ST), etc. to ensure equitable access to program benefits and positive redistribution of impacts on these stakeholders. These engagements shall be treated as a two- way meaningful consultation to disseminate project related information, provide prior intimation about works and possible inconveniences, seek support and cooperation, apart from receiving feedback and suggestions on ways to improve project planning and design to optimize social and program benefits and reduce risks and adverse impacts.

The draft SEP will be reviewed before the appraisal and will remain a 'live' document. It will continue including additional stakeholders, impacts on them and their needs for engagement, spell out the mobilization, and the communication strategy for engaging with them. The output of this exercise will be captured in a stakeholder matrix defining the perceptions and expectations of each stakeholder category and will be tracked through the project cycle. The ESCP will also include conditions for updating the SEP, as required, during project implementation. However, given the COVID-19 situation, consultation with stakeholders will be conducted largely in a virtual manner following the relevant interim technical note on public consultation prepared by the World Bank. During the project implementation, further consultation with the community will be carried out and detailed out in the SEP. The ESMF will also provide mechanisms to incorporate stakeholders' concerns and suggestions in the project implementation in a continuous manner and ways to engage them during the project implementation.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will involve direct workers (government employees at the AMC and GUDC, professionals or subject matter specialists engaged from the market for different technical areas); contracted workers engaged in construction work and consultancy services (contractor staff, firms engaged in the preparation of E&S, technical documents, DPRs); and primary supply workers (vendors of different material). The project does not visualize the involvement of any community workers.

Given the reliance of the state on non-local labor in the construction sector, the program is expected to have a high reliance on them for meeting labor requirements during the implementation phase. Large scale labor influx is expected at certain construction sites like wastewater and sewerage treatment plants; although, on a lower scale, laborers will be expected (for a limited duration) at the sites for construction of new pumping stations and along sewerage alignments when up-gradation, expansion, modernization work is undertaken.

The former (STP sites) will require setting up of labor camps and developing detailed labor-management procedures (LMP) for camp and worksite management and managing risks related to GBV and SEA. Considering the pandemic

related precautions, the LMP will need to be informed by COVID 19 considerations and necessary precautions deployed at the construction sites and the labor camps. The LMP will include an assessment of potential labor-related risks; an overview of labor regulations, policies and procedures; mechanisms to prevent GBV/SEA and harassment; contract terms and working conditions; age regulations; the mechanism for handling labor-related grievances; and other requirements of ESS2 to ensure a safe environment for worker and community.

The LMP will include (i) identification of potential risks and hazards for workers (ii) provisions and enforcement of preventive and protective measures (iii) training of workers and maintenance of training records (iv) documentation and reporting of accidents and incidents (v) remedial and corrective actions (vi) emergency prevention and preparedness and response arrangements to emergencies; vii) Prevention of child labor, forced labor, non-discrimination, use vulnerable workers, etc; and (viii) remedies for adverse impacts such as occupational injuries, deaths, disability, and disease. Periodic site review and audit will be made mandatory to ensure compliance with ESHS procedures.

The LMP will also need to address in detail how the issue of manual scavenging and its associated risks and adverse impacts will be addressed during the activities related to expansion and improvement of the sewerage network. This will involve addressing issues related to worker health and safety, the dignity of labor, prevention of discrimination; and stereotyping and associating of certain communities/ caste with the work related to scavenging.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS 3 is relevant to the project. Screening and exclusion criteria will be included to avoid the financing of activities that generate significant risks and impacts on the natural and physical environment. Project activities involving the improvement and construction of sewerage and stormwater management facilities and Public Health Infrastructure and systems present opportunities to integrate resource efficiency and pollution management aspects during design, implementation, and O&M stages. It is important to build in energy/fuel, water, land, and other resource efficiency features and alternate technologies to ensure sustainable development and operations of services/facilities to enhance health and safety.

From a resource efficiency perspective, the ESMF will include considerations for energy efficiency, water use efficiency, and raw material usage consistent with ESHS and the borrower will adopt measures specified in the EHSGs to optimize energy, water, and raw material usage, to the extent technically and financially feasible. Resource efficiency measures should be analyzed as part of the ESA and will incorporate the need to analyze the need and availability of the resource, use available natural light and ventilation, best alternate technologies such as the use of alternate energy sources / green fuels, energy-efficient pumps, use of solar power, etc.; and use of energy-efficient pumps and fixtures. Minimal use of raw materials and reuse /recycling of construction and demolition wastes (C&D), and reuse and recycle of material and wastes will be ensured.

Water use efficiency will be incorporated in all project activities through minimizing runoff and ensuring water harvesting, protection of existing water sources, use of water conservation features in fittings, and recycling/reuse of water from Sewage / Wastewater Treatment Plants. To ensure pollution prevention and management, the project will ensure the prevention of the release of pollutants to air, water, and land due to routine, nonroutine, and

accidental circumstances. Special design considerations for storage of fuels and materials during construction & operations, control of silt runoff & pollution due to storage and management of construction materials and raw materials, minimization and management of solid wastes (including plastics), batteries, and e-waste (including solar panels, electronic parts, etc.), hazardous waste (asbestos generated during demolition/rehabilitation works, refrigerants from air-conditioners and cooling systems mainly in Public Health / and in case of support to Covid Response related cold chain/facilities), computers and peripherals, digital displays and announcement systems) and C&D wastes generated during preconstruction activities (eg: utility shifting), construction & operation stages. Infrastructure for minimizing and managing wastes and disposal of inert/rejects and will be included in relevant contractual arrangements of the project, particularly the technical design and construction contracts. Impact of light, noise, and air pollution and impacts on land use/receptors will be managed by proper layout planning, incorporating the best practices and ESHS guidelines in detailed design and construction technology/mechanism/schedule to minimize its risks on the environment and the communities, and by using fixtures with low emissions and noise. These will be included as environmental guidelines and best practices in the ESMF. Also at the subproject level, ESIAs will include (i) the baseline noise monitoring and operational phase noise disturbance to sensitive receptors around proposed treatment plants; (ii) identify all source of hazardous and non-hazardous waste and propose mitigation measures proportional to the level of risk, and waste management plans. In the case of improving public health systems (including ICUs, health centers, and laboratory facilities), ESIAs will include national, international (WHO) and World Bank EHS guidance for Biosafety, infection control, BMWM practices required.

ESS4 Community Health and Safety

Health and safety of the communities are important during the construction stage, mainly as networks will be laid in congested city areas, especially in walled city areas. Community health and safety (OCHS) risks and public inconvenience due to the shifting of utilities, material transport, storage, construction, and maintenance activities, are important. The ESA will also assess the risk to communities during the pre-construction stage (eg: inconvenience, noise, disturbance, and pollution due to shifting utilities, arranging materials and labor), pedestrian-vehicular conflicts and disturbance during construction, and all other health and safety issues during its life cycle including the release of pollutants/wastes (including from Public Health Systems) and propose management measures following the mitigation hierarchy, such as emergency response measures which will be incorporated into the ESCP.

AMC will be required to consider all community-related health and safety risks identified in the ESIA and include necessary mitigation plans. AMC along with the contractor will have to prepare a traffic management plan, community health and safety measures, and emergency response preparedness to mitigate all possible health and safety risks during the construction and operation phase. This will also include ensuring that traditional stormwater drains and run-off channels don’t get encroached by squatters and choked in the process, impacting the safety of those living on unplanned settlements in hazard-prone areas.

TA and Construction and Operations/Maintenance will be planned, designed, and implemented to comply with the World Bank Group’s Environment, Health, and Safety guidelines.

During the preparation of the project, an assessment of Sexual Exploitation and Abuse and Harassment (SEA/H) will be conducted following the World Bank's Good Practice Note on this issue. The AMC will prepare an Action Plan to mitigate SEA/SH caused by project activities.
Assessment of required COVID-19 response for all staff directly and indirectly involved with health care facilities as well as workers involved in the project will be assessed as part of ESMF.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

At this stage, the land requirement for the project is not known. As the preparation advances the specific land requirements, sites will be known, as will be whether public/ municipal land is available for those requirements and whether private land will need to be acquired. As per an interim assessment land of different dimensions will be required for the STP and Intermediate Sewerage Pumping Stations (IPS/SPS). The size of the parcel will depend on the capacity of these plants and pumping stations. Since land is a limited resource in the municipal area, to the extent possible, the AMC will seek to identify existing municipal lands for setting up these utilities or seeking transfer of land from other government departments/ agencies. To the extent possible, the project will try to get government land, and only in case of non-availability will it go for land procurement through voluntary transaction, negotiated settlement/ direct purchase from a willing buyer etc. Eminent domain will be used by the state as a last resort after other alternatives have been explored and will not be used on the same parties with which negotiations have been conducted in the past. AMC will prepare an RPF by appraisal and subsequent subproject-specific RAPs based on the RPF. The ESIA will also cover the potential impacts associated with this land purchase.

In addition, assessments will also be required to see the scale of resettlement impact of the program interventions on the residents. There are bound to be impacts (permanent or temporary economic and physical displacement) as a result of alignment improvement and construction related works across Ahmedabad city. These will include livelihood related impacts on vendors and hawkers, impacts on encroachments/ squatters along the alignments/ RoW, and access related inconveniences to neighboring communities.

Site-specific ESIA will also need to assess the potential economic and social impacts of land transaction on the sellers to ensure that such transaction does not affect the sellers and their households adversely. This will, in turn, inform the need for a full fledged RAP as part of preparation. An RPF will be prepared by appraisal which will specify the process to identify and mitigate land-related adverse impacts. Once the design and alignments are finalized, sub-project specifc RAPs (as required) will be prepared to draw a baseline on the number of affected persons, nature and scale of impacts and develop a entitlement and compensation mechanisms based on prevailing norms and community consultations.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS 6 is relevant. Lakes, ponds, parks, canals, rivers (Eg: Sabarmati bifurcating the city, Khari River receiving outflow from Kharicut Canal passing through the eastern part of the city, Chandrabaga Canal) are present in the city area, though there are no protected areas or critical natural habitat areas.

Sub-project locations are unknown today and 30% of subprojects will be identified and detailed out during the preparation stage. Following the ESS6 requirements, any potential adverse risks and impacts on biodiverse areas and living natural resources due to implementation works will be determined during the preparation stage. ESA will identify possibilities of such risks and impacts. ESMF will include environment screening and exclusion criteria to be used for subprojects to avoid critical habitats, forest / protected areas, or other such areas for proposed works.

Subproject ESIAs will identify risks (including cumulative risks if any) on aquatic and terrestrial biodiversity areas and communities dependent on these and prepare ESMPs for managing/mitigating risks. By incorporating ESMP conditions (which will be incorporated in bid documents), monitoring measures, and environmental guidelines for detailed design in areas near sensitive receptors/biodiversity/living natural resources, and sourcing of materials from these areas, the impacts/risks can be minimized, mitigated and managed.

ESMPs will include measures to prevent risks and impacts on land, fauna, flora, and water bodies (including rivers, lakes, ponds, and life therein) due to (i) runoff from material storage areas, (iii) depletion of tree cover during the development of Treatment Plants or laying of networks, (iv) pollution from worksites including the deposition of fuel/wastes from construction sites, labor camps, fuel storage, vehicle maintenance areas during construction; and (v) flow of pollutants from treatment plants and O&M of facilities created. In case of need for tree felling, the permit will be sought from AMC as applicable and compensatory afforestation will be ensured and as in the case of other ESMP and monitoring measures, these will be included in ESMP cost estimates. It will not be allowed to convert lands under sensitive wetlands, sacred groves, designated parks, and open spaces for proposed facilities or material storage areas. Supervising and monitoring arrangements for sub-projects near/around sensitive areas will include the services of a biodiversity specialist.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Less than two percent of the city population comprises of the scheduled tribes. They belong to different tribal groups, originate in different regions of the state and outside. They are dispersed across the city. Since they don't carry any distinct social and cultural identity, ESS7 is not relevant in this case.

ESS8 Cultural Heritage

ESS 8 is relevant. Ahmedabad is a World Heritage City with many heritage precincts, monuments, and features, mostly in the 'old city' area. Works related to sewerage network augmentation are proposed in the old part of the city, and hence there is a likelihood that the areas have several sites and structures with religious, cultural, archaeological, and historical significance. The risks and impacts to cultural heritage include vibration and activities such as drilling, excavations, demolitions, causing a disturbance, or other physical changes, including air or water pollution-related damage and risks to heritage structure, access restrictions to communities during works, etc.

During ESA, screening for potential cultural heritage features –protected assets and those non-protected but significant to the communities, possible impacts, and legal/other requirements will be undertaken. At the DPR stage, the project will use a screening matrix and community consultations to screen and exclude areas near key heritage

features to avoid impacts. Special focus will be given to the protection of tangible or intangible cultural heritage. During sub-project preparation, such identified direct, indirect, and cumulative cultural heritage related risks and impacts, and chance finds will be managed as per the national regulations and ESF; with the involvement of Heritage/Conservation experts.

Since the project will involve extensive earthwork, physical excavation for laying new sewerage distribution lines, it may pose risks to the cultural heritage of the city. Mitigation measures or a Cultural Heritage Management Plan (CHMP) will be prepared as part of the ESIA/ESMP following the framework provided in ESMF based on nature and scale of risks and impacts, and management needs will be included in the ESCP. Procedures for handling chance finds will be prepared as part of the ESA and will be included in the ESMPs and the Bidding Documents. It will also involve capacitating the project contractors on handling chance findings, reporting/ notifying authorities, cordoning sites, and seeking the services of cultural heritage experts to manage the finds.

ESS9 Financial Intermediaries

ESS 9 is not relevant as no Financial Intermediaries are envisaged at this stage.

B.3 Other Relevant Project Risks

1. Varying capacities of contractors on E&S management and adherence to regulations

2. The ongoing COVID-19 global pandemic presents a risk for preparation and implementation of the project; mainly to visit and evaluate various sites in the pipeline and ongoing activities owing to COVID 19 related travel restrictions. Also, impacts/risks of labor availability and composition incase of COVID 19 related restrictions are additional risks.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

No financing partners are identified at this stage.

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

The following documents/actions would be required before Bank Appraisal for this operation to allow for informed decision-making, commensurate with issues/risks identified during the preparation stage:

1) Preparation and disclosure of ESCP
2) Preparation, consultation, and disclosure of ESMF will define the approach to prepare subproject ESIAs with site-specific ESMPs and other instruments as required;
3) ESIAs with site-specific ESMPs and RAP (if required) for 30 % of subproject investments (as per country readiness criteria) in Drainage / Waste Water Sector
4) Preparation, consultation, and disclosure of SEP
5) Setting up of functional program-specific GRM
6) Terms of Reference for TA (for consultancy support) incorporating E&S requirements for studies, the need to prepare and follow ESMF for TA.
7) Institutional arrangements to facilitate application and implementation of ESF instruments at PIUs and State Level Coordinating Agency; during sub-project implementation works.
8) Documentation to meet requirements to meet all relevant ESSs including resettlement policy framework, Labor Management Procedure, Stakeholder Engagement Framework; GBV risk mitigation framework, tribal development framework, Guidance on Biodiversity and Cultural Heritage Management, guidance on environmental best practices including sustainable water recycling, reuse, and energy efficiency. MPs to include requirements on Labour and Working Conditions.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The following key aspects are likely to be a part of Borrower's ESCP:

1) Environment and Social Management Capacities (staff) at the PIU/s and at State level, and with the Contractors / PPP agencies to implement ESCP
2) Preparation and implementation of specific frameworks, instruments/plans (including but not limited to EHSS Audits in case of upgradation of existing facilities, ESIAs & ESMPs, RAPs, LMPs, Traffic and road safety management plan, emergency response preparedness plan, GBV Action Plan, etc., for drainage, wastewater sector projects and Hospital / ICU facilities, EHRMPs for clinics and Public Health Labs) to meet the requirements set forth in E&S Standards as sub-project specific instruments during project implementation; beyond the Appraisal Stage and their disclosure
3) Preparation and updating of sub-project specific Stakeholder Engagement Plan (including GRM) based on the SEF during the project cycle
4) Management of Contractors and ensure adherence to E&S conditions and ESMP throughout implementation, Operation, and maintenance
5) Provisions for worksite safety and labor management, including OHS aspects and COVID 19 guidelines/protocols
6) Processes and timelines for obtaining requisite statutory clearances at local, state, and national levels
7) Training and Capacity Building Plan of Project Officials, Contractors
8) Setting up of project and State level GRMs

9) Provisions to prepare as well as update and monitor the LMP including the GRM for labor during the project life cycle
10) Implementation of capacity building plan and ESF training to all supply-side stakeholders

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 31-Aug-2021

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Urban Development and Urban Housing Department

Implementing Agency(ies)

Implementing Agency: Ahmedabad Minicipal Corporation

Implementing Agency: Gujarat Urban Development Company

Implementing Agency: Ahmedabad Municipal Corporation

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Roland White, Harsh Goyal
Practice Manager (ENR/Social)	Kevin A Tomlinson Recommended on 13-Jan-2021 at 08:48:9 GMT-05:00
Safeguards Advisor ESSA	Agnes I. Kiss (SAESSA) Cleared on 03-Feb-2021 at 14:14:16 GMT-05:00