

Status of CGPL's Compliance to IFC's Environment and Social Requirement during Pre-Operation Phase & Operation Phase

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
1.	Environmental and Social Organization Structure & Capacity Building	PS1: Social and Environmental Assessment And Management Systems	CGPL has developed a Social, Environmental, Occupational Health & Safety organization structure which was headed by Chief - Safety, Health & Environment. Associated Group Head – Safety was appointed so that safety aspects were implemented more rigorously. Safety stewards were also appointed. Well-equipped medical center was established on site. CR department was developed along with establishment of VDAC in the village, Community Information Centre. Technological support was provided like GRC software, online review mechanism, etc. O&M staff was hired early in project development stage to ensure appropriate transition.	CGPL has developed a Sustainability Department, headed by Chief Sustainability Officer and comprise of three verticals, namely Environment, Biodiversity and CSR. Both verticals are headed by Environmental and Social experts respectively and are sufficiently staffed. The Environment department is responsible for ensuring that operations are in compliance with stipulated Environmental norms and lender's requirements. Remedial measures/research studies in response to emerging environmental issues are also conducted by the Department. Similarly, the CSR team is responsible for Social safeguards, community developmental activities in line with the CSR commitments of CGPL. Further, Tata Power Community Development Trust (TPCDT) are also involved in implementing CSR activities at CGPL. With project now in full scale operation CGPL has in place a dedicated O&M team comprising of Dept. Heads, Line Managers, and Operational Contractor taking care of O&M activities. All environmental and social safeguard activities are monitored in-house and relevant reports are submitted to regulatory authorities/lenders. Third party evaluations are conducted on a periodic basis. Some of the CSR activities are implemented directly by CGPL, while most

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				<p>of the CSR activities have been implemented jointly with specialized project partners¹ such as Pratham, AKRSP etc., which are providing qualitative and quantitative results. The documentation process has now been developed. CGPL regularly conducts internal trainings, audits and various studies which help the team in developing their skillsets.</p>
2.	Implement a certified environmental, health and safety management system (EHSMS) based on ISO 14001 and OHSAS 18001 prior to commissioning of the first unit		During construction stage EHS impacts were managed through Tata Power's EHS management system which was already certified management system of IS 14001 and OHSAS 18001. In addition to this, CGPL has also adopted EHS management system of project contractor (M/s DOOSAN).	Integrated Management System (IMS) certification has been awarded to CGPL on 4th July 2014. IMS takes into consideration all statutory environmental parameters mandated for monitoring by regulatory authorities such as MoEF & CC (Ministry of Environment, Forests & Climate Change) and GPCB (Gujarat Pollution Control Board). CGPL reports status of the environmental parameters to statutory authorities as per prescribed reporting periods. These reporting are in accordance to the IMS formats. During IMS audit, compliance to all Environment, Health & Safety parameters and their reporting to the regulatory agencies are reviewed. CGPL has adopted the health and safety system (with guidance from Dupont) that includes well defined performance standards, procedures and guidelines (such as Hazard Identification and Risk Analysis (HIRA), SCAR (Safety Corrective Action Request) etc.), safety awareness programs (Safety Time Out) and establishing key

¹ Websites of Partner NGOs – Pratham (www.pratham.org), AKRSP (www.akdn.org)

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				performance indicators (e.g. lost time incidents, severity rate, near miss etc.), which are used to track compliance with Health and Safety (H&S) targets.
3.	Manage EHS impacts during construction according to Tata Power's EHSMS, which is certified to ISO 14001 and OHSAS 18001 standards and will ensure adherence to good EHS practices and an environment management plan, through appropriate contractual provisions with various supply and construction contractors.		Construction stage EHS impacts were managed through Tata Power's EHS management system; related contractual provisions were incorporated	CGPL has obtained certification for Integrated Management System (IMS) through which EHS aspects are managed.
4.	Adopt Tata Group Code of Conduct		Every employee of CGPL follows mandatorily the Tata Group Code of Conduct	Every employee of CGPL follows mandatorily the Tata Group Code of Conduct
5.	Ensure all the required permits and licenses relating to EHS & Social management are obtained and their conditions are adhered to		CGPL had obtained valid environmental permits/consents for project initiaion, hazardous and biomedical waste management from Gujarat Pollution Control Board, MoEF and had done periodic compliance reporting to these regulatory authorities as required under specific consent conditions. Detailed compliance status of each condition under the permits received was monitored and maintained. CGPL	CGPL possess valid environmental permits/consents for project operations, hazardous and biomedical waste management from Gujarat Pollution Control Board, MoEF and is carrying out periodic compliance reporting to these regulatory authorities as required under these permits/consents conditions. CGPL possess valid license under the Factories Act, Contract Labour Act, Building & Other

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			<p>possessed valid license under the Factories Act, Contract Labour Act, and Building & Other Construction Workers Act with annual returns.</p>	<p>Construction Workers Act with annual returns found to be submitted for the period 2014-15 under the provisions of the Act. Copies of the annual returns under the provisions of the applicable labour and employee's rules were reviewed during the visit.</p>
6.	<p>Undertake a modeling study through a reputed international consultant organization, to assess the impacts of the open seawater intake and discharge channels on the marine environment</p>		<p>Hydraulic design and modelling studies has been undertaken by HR Wallingford and Marine Environment Impact Assessment as undertaken by NIO in 2009.</p>	<p>The project has been designed based on once through cooling system with the cooling being discharged into the sea through a 7.3 km long outfall channel. Further such cooling water discharge location has been selected based on the Thermal and Salinity modeling study undertaken by NIO. Hydraulic design and modelling studies has been undertaken by HR Wallingford and Marine Environment Impact Assessment as undertaken by NIO. CGPL has engaged NIO for conducting monitoring and model conformity studies of the condenser cooling water discharge system have been completed in Dec'13. The study concluded that with the continuous release of return seawater effluent at temperature 7°C above ambient in the outfall channel, near ambient conditions were being attained at a distance of 500 m from the channel mouth. This distance is much shorter than prediction of 3 km by HR Wallingford based on the modeling studies conducted by them prior to the establishment of the CGPL power plant. NIO further conducted model conformity study in worst case scenario i.e. summer (April-May) wherein similar results were</p>

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					obtained. Extensive field observations conducted during December 2013 and April 2015 and its comparison with the results of pre-project baseline ascertains absence of appreciable changes in water and sediment qualities of the coastal zone off Vandh and the observed deviations were within the natural variability inherent to the coastal areas.
7.	Supplement (within a timeframe agreed with IFC) the Rapid Marine EIA through more in-depth analysis as more detailed project-related information becomes available, make the study available for IFC's review and incorporate any suggestions recommended by IFC; and implement the management plan developed as part of the study, with IFC's recommendations duly incorporated		Conducted environment assessment for both the land and marine component of the project, supplemented to address change in sea water intake and outfall locations, external coal handling system and in response to lender's queries on the assessment primarily relating to additional environmental considerations (such as cumulative impacts). http://www.tatapower.com/cgpl-mundra/pdf/CEIA-Complete.pdf , http://www.tatapower.com/cgpl-mundra/pdf/NIO-Study-Feb-09.pdf , http://www.tatapower.com/cgpl-mundra/pdf/BNHS-Report-R1.pdf	CGPL shared the Rapid Marine EIA conducted by NIO with IFC for review and incorporation of any recommendation. Feedback from IFC was incorporated and all these assessments have received environmental approval from the Government of India. All the statutory requirements and management plan aspects are part of IMS are being implemented/monitored through IMS.	
8.	Develop and implement measures (in consultation with the affected communities) to		A Rehabilitation Entitlement Matrix was developed and executed to address mitigations with respect to (a) Loss of Agricultural Land & Assets {Land was acquired at replacement value through	CGPL's Community Relations portfolio expanded much beyond the components identified in the Rehabilitation Entitlement Matrix. However, the mitigation measures initiated in the construction phase were	

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	<p>mitigate the impacts identified in the Baseline SIA (disclosed with initial ESRS) including restoration of livelihood, community development and long-term stakeholders engagement process. ESRS to be updated to reflect the findings and outcome of the consultation and implementation of these measures</p>		<p>consent mechanism}, (b) Loss of Non agricultural lands, crops, trees etc {compensated at market value}, (c) Loss of Primary Source of Income { Provided direct and indirect employment, business opportunities as well as training assistance for income restoration}, (d) Loss of Common Property resources {extensive social infrastructure, significant interventions in fodder supply and SHG activities with women}. As part of mitigation of unanticipated adverse impact due to project a massive programme on Livelihood Support of fishermen was undertaken {Cash Compensation for income restoration and periodic support through provision of fishing gears. Interventions on improvement of standard of living of the fishermen were also undertaken}.</p> <p>Above activities were duly audited by third party to ascertain community satisfaction index and performance of CGPL's CR activities.</p>	<p>wholesomely continued in the operation phase as well. CGPL put a policy in place to involve local community members through job and business opportunities. Through this policy CGPL has provided employment and job contracts to local people, including those community members who have sold their land to the project</p> <p>Mitigation of key social impact of loss of grazing land through establishment of Gaushalas during pre-operation phase has been continued through regular supply of fodder. CGPL supplies fodder for cattle amounting to approximately USD 700,000 annually.</p> <p>For fisher communities, livelihood enhancement and community development initiatives has been undertaken for the two villages of Tragadi, Modhva and Tragadi Bundar. CGPL's intervention in Livelihood Support & Improvement in Quality of Life from inception till date has a total investment of USD 1.3 Million.</p> <p>Community Development activities are being undertaken through annual business plans that are prepared every year in close consultation with the local communities/ stakeholders. CGPL has prepared and implemented CDP, Rules for Business Opportunity to Local Community, Strategic intent for CGPL's sustainability programmes, and other such plans.</p>

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				<p>Specific programmes based on findings and recommendations of independent studies undertaken by ERM, MGLI, Karma, AKRSP, TISS etc. Community level groups such as Village Development Advisory Committees, CIC, Gaushala Trusts, Fishermen's Association, SHGs, etc have been formed for directly engaging and implementing CSR interventions with various communities.</p> <p>Documentation of the various programmes is being undertaken. Grievances and community level requests are collected in the documentation cell and resolved in the monthly meeting of CSR team. Daksh, employability software is implemented for online reporting and recording of database of bio-data received from various groups/stakeholders.</p> <p>The stakeholder engagement undertaken by CGPL and the community development activities are being verified through a reputed agency, to assess the changes in the area and also measure the community satisfaction index.</p>
9.	Share IFC's Performance Standards on Social and Environmental Sustainability (Performance Standards and PSs) with PGCIL (PowerGrid), to		Shared the relevant PS and EHS guidelines with Powergrid	Shared the relevant PS and EHS guidelines with Powergrid

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	construct, operate and maintain the above transmission lines in accordance with IFC's Performance Standards			
10.	Implement an EHS monitoring program (within a timeframe agreed with IFC) consistent with IFC's EHS guidelines both for construction and operation phases		EHS monitoring program was implemented during pre-operation phase of the project. Both in-house and third party monitoring procedures were included in the program. The monitoring locations, frequency, and parameters were as per regulatory requirements, updated to also include requirements of IFC's EHS guidelines.	EHS monitoring program is part of the operational control procedures of the IMS implemented during operation phase. Both in-house and third party monitoring procedures are included in the program. The monitoring locations, frequency, and parameters are as per regulatory requirements, updated to also include requirements of IFC's EHS guidelines. The monitoring reports are shared with relevant regulatory agencies like MoEF & GPCB as per the schedule required by various permits/clearances.
11.	Implement an appropriate internal and third party EHS audit program, as part of the ISO 14001 and OHSAS 18001 certified EHSMS		Internal EHS audit program as well as external third party audits were conducted.	Apart from development of internal EHS audit programs an external third party is engaged as part of the ISO 14001 and OHSAS 18001 certified EHSMS. Compliance against lender's requirements are also audited by a third party.
12.	Detail a program to monitor the progress/status of implementation and outcomes of the mitigation measures and also the CDP		Status and outcomes of mitigation measures of all the identified EHS and social risks is monitored both through internal and external audit programs. EHS & Social performance is monitored through external audit programs of lenders on a quarterly as well as annual basis. Progress and outcome of Community Development activities are documented in the	Programs to monitor Social and EHS management both at site and corporate level for CGPL as well as Tata Power are in place to monitor progress and status of implementation and outcomes of the mitigation measures relating to EHS & Social risks identified. The programs include Risk Management System of Tata

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			form of Annual Report, and a Social Audit is also undertaken on an annual basis.	Power, Tata Business Excellence Model, and Integrated Management System. The EHS & Social performance is also monitored through external audit programs of lenders on a quarterly as well as annual basis. Progress and outcome of Community Development activities is documented in the form of Annual Report, specific studies and implementation undertaken such as socio economic assessment conducted by ERM, Sagarbandhu Programme AKRSP, various social audit and others thematic (geo-hydrology) studies. Status and outcomes of mitigation measures of all the identified EHS and social risks is monitored both through internal and external audit programs. Progress and outcome of Community Development activities is documented in the form of Annual Report.
13.	Implement an appropriate third party social audit program to be undertaken two years after finalization of the mitigation measures proposed in the Baseline SIA.		Agencies like TISS, and MGLI were engaged to undertake social audit (implementation of mitigation measures indicated in the Baseline Social Impact Assessment and the Livelihood Restoration Framework) annually.	Agencies like TISS and MGLI are engaged to undertake social audit of CSR interventions (implementation of mitigation measures indicated in the Baseline Social Impact Assessment and the Livelihood Restoration Framework) annually and shared with lenders. Additional social assessment has also been undertaken in 2015 by independent external agency ERM.
14.	Implement (as part of its Social and EHS Management System), a reporting program on site management and		CGPL has following reporting formats for EHS management for Tata Power Senior Management & Tata Power's Board of Directors: Monthly basis reporting CGPL corporate and	A reporting process exists for site management and corporate Social and EHS management for CGPL on monthly basis (viz. GMI, Environmental Compliance Adherence, Dashboard, CSR Budget adherence, Safety score card, etc.) as well

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	corporate Social and EHS management for Tata Power senior management and for Tata Power's Board of Directors		senior management at the Site. Reporting includes MI, Environmental Compliance Adherence, Dashboard, CSR Budget adherence, Safety score card, etc.; Quarterly basis reporting to CGPL's and Tata Power's Board of Directors and Tata Power Apex Sustainability Committee. Reporting includes Quarterly Sustainability progress report, GMI, etc.; and Annual report is submitted to Tata Power/ CGPL CSR committee.	as Tata Power senior management. Reporting process on quarterly basis also exists for reporting to CGPL's and Tata Power's Board of Directors and Tata Power Apex Sustainability Committee (viz. Quarterly Sustainability progress report, GMI, etc.). Further, Annual report is submitted to Tata Power/ CGPL CSR committee.
15.	Submit on a six monthly cycle, compliance reports to regulators		CGPL submits the six monthly compliance reports to MoEF, GPCB and other regulatory agencies.	Six monthly and annual compliance reports to MoEF & GPCB (on compliance with the conditions of approval under Environment & CRZ clearances and CC&A) are submitted regularly. The copies of the same are made available on CGPL website.
16.	Stakeholder engagement to be done systematically		CGPL had a mechanism for stakeholder engagement through its CR team's routine interactions with the community and partnerships with Civil Society Organizations. Stakeholder's feedback was received through a consultative process conducted inside the villages. At this point a CIC (Community Information Centre) was conceived and skeletal staff was put in place keeping in view the future requirements. The CR team actively responded to the community issues /complainant as and when they came by. Annual Environmental & Social Performance Report – CGPL Power Plant, Mundra was published and disclosed by third party. Several thematic studies have been conducted to understand the social and environmental dynamics of the area and CR Plans were formulated in accordance to the	CGPL has Strategic Intent & CSR Policy in place where community and stakeholder engagement is an integral component. To carry out systematic stakeholder engagement, a CIC (Community Information Centre) has been in place and a dedicated coordinator is appointed in the CIC which is functioning under the aegis of Community Relations (CR)-CGPL. CIC is one of those aspects, where the community comes with their suggestions and/or complaints, which are then forwarded to the senior management of site operations and responded or acted upon by the respective department competent or empowered to deal with it. CIC is then used as a mode to respond back to the community / complainant. Documentation and reporting has become

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			<p>finding of these studies. Senior officials of CGPL along with the CR team interacted with the communities on the basis of immediate issues concerning the community. Documentation of key events has also been undertaken along with preparation of the beneficiary lists. Documents and database of Land Sellers/Titleholders has been prepared and maintained by CGPL.</p>	<p>more comprehensive, and is being carried out in a systematic manner. Current reports including Social Audit Reports, Project reports from partner NGOs, internal reports, Minutes of meetings, photo gallery has been established. All aspects of community related interventions, list of NGO Partners, FAQs, etc. are uploaded on the Tata Power-CGPL website (http://www.tatapower.com/cgpl-mundra/home.aspx).</p> <p>Annual Environmental & Social Performance/Audit Report is also conducted by third party and disclosed by CGPL. An Annual Report of CGPL CSR intervention is also published. Stakeholder's feedback on CGPL's interventions has been documented as "SAMVAD"- A periodic publication. Flyers and you tube videos are prepared and shared to highlight programs and spread awareness about project activity.</p> <p>Documentation of key events has also been undertaken along with preparation of the beneficiary lists. Some reports are one time reports, but regular monthly, quarterly and annual reports are now prepared and circulated among stakeholders.</p>
17.	Implement a program to share Social and EHS performance information with communities		Information on social performance is communicated through village newsletters, annual reports, and video clips. EHS performance is communicated through electronic display boards and visual display boards outside the main gate of CGPL plant	The process of information has been further strengthened by sharing information on social performance and such information is readily available at the CIC. The annual reports and video clips related to social and EHS performances are shared on CGPL

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	resident in the vicinity of the plant		premises. Link to published newsletter and video clips are given below: http://www.tatapower.com/cgpl-mundra/csr.aspx	website and Tube videos. EHS performance is communicated through electronic display boards outside the main gate of CGPL plant premises. CIC is located outside the plant boundaries and open access is allowed to meet CGPL/TPCDT officials. In addition CGPL and TPCDT members also meet and interact with various groups/communities and stakeholders directly and through various groups formed for the purpose. Communication is also undertaken by the NGO partners as a part of the implementation process. As the responsibility of the CSR interventions implemented is shared by Community through Panchayat, VDAC and other groups and CGPL there is a regular communication for the execution of the CSR activities. http://www.tatapower.com/cgpl-mundra/home.aspx
18.	Prepare a Corporate Sustainability Report and within a timeframe agreed with IFC, incorporate CGPL's Social and EHS performance in its CSR; and disclose the CSR on its website		Tata Power prepares a Corporate Sustainability report and discloses it on its website. CGPL's work details are included in this report. http://www.tatapower.com/cgpl-mundra/home.aspx	Tata Power prepares a Corporate Sustainability report and discloses it on its website. CGPL's operations are included in this report. CGPL has also created a micro-site for wider disclosure of specific performance on sustainability issues http://www.tatapower.com/cgpl-mundra/home.aspx
19.	Integrate CGPL's Human Resources Management governing all	PS2: Labor and Working Conditions	CGPL's Human Resources Management governing all permanent employees, is integrated into the larger Tata Power HR management system	CGPL's Human Resources Management governing all permanent employees, is integrated into the larger Tata Power HR management system

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	<p>permanent employees, into the larger Tata Power HR management system which is governed by a policy that is consistent with the ILO declaration on fundamental principles and rights at work</p>			
20.	<p>Review IFC's PS 2 provisions and ensure that its policies and practices are consistent with PS2 requirements</p>		<p>Policies and practices of CGPL related to labour and working conditions were in compliances with IFC's PS2 requirements</p>	<p>HR management system of CGPL is in compliance with IFC's PS2 requirements</p>
21.	<p>Implement procedures to ensure that contractors engaged at the project site adhere to applicable contract labor laws</p>		<p>Stringent procedures had been implemented to ensure that contractors engaged at the project site adhere to applicable contract labor laws. Moreover, this was also factored in the work order issued to contractors. Assessment of compliance to the relevant conditions was done during periodic meeting with contractors.</p>	<p>Stringent procedures have been implemented to ensure that contractors engaged at the project site adhere to applicable contract labor laws, and include integrating it into procurement as well as renewal of entry permits. Moreover, this is also factored in the work order issued to contractors. Assessment of compliance to the relevant conditions is done during periodic meeting with contractors, which is held frequently.</p>
22.	<p>Implement a contract labor grievance management plan in accordance with Tata Power corporate policies,</p>		<p>Contract labor grievance management plan in accordance with Tata Power corporate policies, applicable labor laws and PS2 provisions, was in place. The procedure primarily includes a tiered grievance mechanism and time based</p>	<p>Contract labor grievance management plan in accordance with Tata Power corporate policies, applicable labor laws and PS2 provisions, is in place. The procedure primarily includes a tiered grievance mechanism and time based</p>

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	applicable labor laws and PS2 provisions		response to grievances, both with the contractor as well as CGPL, and information dissemination of this mechanism.	response to grievances, both with the contractor as well as CGPL, and information dissemination of this mechanism.
23.	Provide assurance to IFC that labor relations and conditions for contract laborers are consistent with PS2 requirements throughout the construction period		All relevant documents related to labour relations and conditions for contract laborers were submitted to IFC after verification by Independent EHSS Auditor	All relevant documents related to labour are maintained by CGPL.
24.	Implement an OHSAS 18001 certified health and safety management system prior to plant commissioning		OHSAS 18001 certified health and safety management system implemented during the commissioning stage.	OHSAS 18001 certified health and safety management system implemented during the commissioning stage
25.	Deploy (during construction stage) a safety officer for ensuring that contractors adhere to EHS provisions in the various supply and construction contracts, and also conduct EHS training program for contract labor		A large team of safety officers were deployed during construction stage for ensuring that contractors adhere to EHS provisions in the various supply and construction contracts, and also to conduct EHS training program for contract labor and it still continues in operation stage too.	During operation stage, CGPL has appointed Safety and Fire Head along with team of safety & fire officers for ensuring that contractors adhere to EHS provisions in the various supply and contracts, and also conduct EHS training program for contract labor.
26.	Use supercritical coal technology, which is more energy efficient than subcritical	PS3: Pollution prevention and abatement	CGPL's units are based on super critical technology	CGPL's units are based on super critical technology

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	technology currently used in the existing thermal power plants as well as mid-sized unit based new thermal power projects in India.			
27.	Will not draw groundwater or draw upon surface water resources both during construction and operation		Sea Water Reverse Osmosis (SWRO) has been commissioned and operated by CGPL since Sep'11 to meet the water requirement as per project design. However, drinking water provision for the labour colony during the construction phase was made from purchased drinking water till the time SWRO could not be commissioned. CGPL has not drawn any groundwater to meet its project water requirements.	Sea Water Reverse Osmosis (SWRO) has been commissioned and operated by CGPL since Sep'11 to meet the water requirement as per project design. CGPL has not drawn any groundwater to meet its project water requirements.
28.	Set up a sea water desalination plant to meet its entire boiler make-up and other process and domestic water needs both during construction and operation		Sea Water Reverse Osmosis (SWRO) and Desalination plant has been commissioned and operated by CGPL since Sep'11 to meet the water requirement for construction and operation phases. However, drinking water provision for the labour colony during the construction phase was made from the purchased drinking water till the time SWRO could not be commissioned	Sea Water Reverse Osmosis (SWRO) and Desalination plant has been commissioned and operated by CGPL since Sep'11 to meet the water requirement for construction and operation phases. CGPL has not drawn any groundwater to meet its project water requirements.
29.	The Environmental Management Plan (EMP) provisions for storage and handling of hazardous and other materials will meet IFC requirements		CGPL obtained valid hazardous waste authorization from GPCB as occupier of the facility generating the hazardous wastes generated due to the construction activities.	CGPL possess valid hazardous waste authorization from GPCB as occupier of the facility generating the following hazardous wastes viz. used oil, discarded containers drums and barrels, spent ion exchange resins containing toxic metal, chemical sludge from waste treatment, waste residue containing oil, spent solvents, copper etching residues and discarded asbestos. Also as required under the provision of

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				<p>Hazardous Waste (Management, Handling & Transboundary Movement) Rules, 2008, CGPL is continuing with the submission of annual returns specifying details of hazardous waste disposal to GPCB in prescribed format. Used oil is disposed through M/s N. K. Lubricants Pvt. Ltd. and waste residue containing oil is being disposed through Saurashtra Enviro Projects Pvt. Ltd. ETP sludge (identified as hazardous waste under Hazardous Waste Rules) generated from effluent treatment is being disposed in lined ash pond instead of the GPCB authorized TSDF facility of M/s SEPPL as required under the waste authorization issued. The ETP sludge has been analysed to be of non-hazardous nature and the same has been communicated to GPCB and necessary amendment in the waste authorization is pursued from GPCB.</p> <p>Hazardous waste storage area has necessary display of danger signages and provisions of fire-fighting equipment have been made available to address emergency situations and comply with consent/permit requirements.</p> <p>Hazardous waste generation and disposal records along with Annual returns – Form 4 were verified during site visit.</p> <p>Biomedical waste generated from the onsite CGPL Occupational Health Centre is being managed through authorised bio-medical waste disposal facility. CGPL has valid authorization for storage, handling and disposal of bio-medical waste. Colour</p>

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				coded bio-medical waste bins are provided at health centre.
30.	Ensure that PCB containing transformer oils is not used and no asbestos containing material is used in the project		Transformer oil used in the project was free of PCB, and no asbestos containing material was used as part of the project	Transformer oil used in the project is free of PCB, and no asbestos containing material used as part of the project
31.	Design the project to meet The World Bank Group/IFC's EHS Guidelines for New Thermal Power Plants (1998 Pollution Prevention and Abatement Handbook) and General EHS Guidelines dated April 30, 2007		The project has been designed to meet all the WB and IFC's EHS guidelines applicable for the project and has been independently verified	The project has been designed to meet all the WB and IFC's EHS guidelines applicable for the project and has been independently verified
32.	Particulate matter emission levels will be limited to 100 mg/Nm3 and sulfur in fuel will be 1%. The ESP (Electrostatic Precipitator) will be designed to ensure that particulate matter emissions are limited to 50 mg/Nm3 at 6% excess oxygen to meet IFC guideline		CGPL have already taken all the flue gas parameters taken into design consideration specified by World Bank Group Guidelines for Thermal Power Plants. Sulphur content will be limited to <0.6%.	CGPL performs regular monitoring of flue gas emissions both online using Continuous Emission Monitoring System (CEMS) and manually to check conformance with the emission standards specified by World Bank Group Guidelines for Thermal Power Plants at same time evaluating the performance of electrostatic precipitators (ESPs) and low NOx burners installed as air pollution control devices. Interpretation of manual monitoring results for period July to Nov'15 reveals compliance to the World Bank emission standards for particulate matter, SO2 and NOX and complied with consolidated

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	requirements			consent authorization for particulate matter. Sulphur content in coal was less than 1%.
33.	Use a low NOx burner technology enabling plant NOx emissions to meet IFC's NOx emissions standards (750 mg/Nm3 at 6% excess oxygen)		Low NOx burner has been installed which will meet IFC's NOx emission standards.	Low NOx burner has been installed in plant. Interpretation of manual monitoring results for period July to Nov'15 reveals compliance to the World Bank emission standards for NOX.
34.	Limit sulfur content of coal to 0.6% or less and will meet IFC SO2 emission guidelines of 2,000 mg/Nm3 (at 6% excess oxygen) and 450 ton SO2 per day, without using FGD		CGPL will periodically monitor the consumption, quality of coal and the resulting SOx emissions. Space provision for FGD is made. Once through sea water cooling system is set-up as committed. Sulfur content of less than 0.6% in coal, concentration of less than 2000 mg/Nm3, as well as 450 ton/day will be met.	CGPL is currently utilizing blended coal for operation of all the 5 units. Review of the coal quality and consumption records reveal that the CGPL is currently in compliance to the project Environmental Clearance (EC) requirement to this aspect. CGPL will continue to periodically monitor the consumption and quality of coal and also the resulting SOx emissions. Sulfur content of less than 0.6% in coal, concentration of less than 2000 mg/Nm3, as well as 450 ton/day has been consistently met.
35.	Make a space provision as per Ministry of Environment and Forests (MoEF) clearance condition for retrofitting an FGD unit in case it is required in the future			Space provision for FGD made.
36.	Set-up a once through sea water cooling system with designed seawater			Once through sea water cooling system set-up and operational as committed

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	intake capacity of 620,000m ³ /hr (including the amount required for desalination plant) and 594,200 m ³ /hr of thermal discharge with elevated temperature. The balance will be used in the desalination plant for other plant uses			
37.	The condenser cooling discharge water temperature is expected to meet IFC's thermal discharge guidelines (3 Celsius at the edge of the mixing zone)		The online monitoring of cooling water temperature near ash silo bridge and manual monitoring near retaining wall will be noted to ensure thermal discharge guidelines. The HR Wallingford study predicted that the thermal discharge norms will be met at around 3Km. It will be ensured that compliance with the temperature difference standard of 7°C specified at the cooling water discharge point by EC Amendment condition dated 5th April'07 will be achieved.	The online monitoring of cooling water temperature near ash silo bridge and manual monitoring near retaining wall from July to Nov'15 reveals average temperature difference from ambient seawater temperature of 4.89 and 3.7°C respectively. It is to be noted, that retaining wall is located 3.3 km prior to the end of dredged outfall channel. This is found to be in compliance with the temperature difference standard of 7°C specified at the cooling water discharge point by EC Amendment condition dated 5th April'07
38.	Implement various mitigation measures proposed in the Rapid Marine EIA to minimize impacts on the marine environment and fishery resources		The intake channel has been suitably oriented and site slopes designed based on the model studies undertaken to minimize possible changes in the pattern of littoral drift locally. Construction period on the sea side was limited and spillage avoided minimizing any temporary destruction of macro-benthos along the corridors selected for sea water intake and discharge. No temporary colonies were established in the CRZ area followed by	CGPL has taken extensive measures to ensure that the aquatic health of the outfall channel is benign. For this purpose concurrent Cage Fishing projects have been adopted and the performance of this initiative has been found satisfactory. Moreover, regular monitoring of physical and chemical parameters of the water sample of the outfall channel is conducted. Dredge spoil generated during excavation

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			<p>a general clean-up of discarded materials during construction phase. Dredge spoil generated during excavation of the channel is used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets placed across the intake channel along with moving screens to avoid destruction of marine organisms. Attainment of near ambient temperatures and salinity of water discharge will be ensured and monitored. MoU was signed with Gujarat Ecological Commission on May'10 to initiate the restoration plantation and conservation of mangroves for an area of 1000 hectares in Kanthiajal, Gujarat and the same was completed. BNHS is conducting a study on sea turtle monitoring since 2011 and the same will be continued.</p>	<p>of the channel is used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets remains placed across the intake channel along with moving screens to avoid destruction of marine organisms. Attainment of near ambient temperatures and salinity of water discharge is being ensured and monitored. Mangrove afforestation initiatives completed at Kantiyajal, Bharuch at 1000 Ha. Periodic monitoring of the marine environment and ecology is continuing. Further, BNHS is also conducting a study on sea turtle monitoring since 2011. Phase II sea turtle monitoring has been conducted for 2012-14. Phase III monitoring by BNHS has commenced from March 2015 for three years. Till date there has been no evidence of turtle nesting in the coast line fronting the intake and outfall channel.</p>
39.	Ensure that residual chlorine and/or other biocides used to treat sea water, remain within IFC EHS guideline levels		Residual chlorine in sea water will be monitored at the outfall channel.	Total residual chlorine in sea water is being monitored at the retaining wall of outfall channel. The analysis of the same for period of July to Nov'15 reveals that total residual chlorine was below detectable limit.
40.	Reuse treated waste water in the process or discharge on-land for irrigation of green belt		Sewage generated onsite is being managed through commissioning and operation of sewage treatment plants (STPs) at the labour colonies (2 X 500 KLD capacity) and project site (25 KLPD capacity). An effluent treatment plant (ETP) of capacity 55m ³ /hr has been provided to treat the run-off/drainage from coal stockpile, boiler blow down and condenser cooling water (for once through cooling system). The treated effluent will be	Sewage generated onsite is being treated in sewage treatment plants (STPs) at the labour colonies (2 X 500 KLD capacity) and project site (25 KLD capacity). An effluent treatment plant (ETP) of capacity 55m ³ /hr has been commissioned and operational since April '11 to treat the run-off/drainage from coal stockpile, boiler blow down and condenser cooling water (for once through cooling system).

S. No.	Lender's requirement	E&S Reference to E&S Performance Standards Guidelines /	Status - Pre-Operation Phase	Status - Operation Phase
			monitored in order to ensure compliance to CC&A norms and the same will be used for irrigation of green belt.	<p>Review of treated ETP effluent monitoring records from July to Nov'15 reveals compliance to the parameters specified (pH, suspended solids and oil & grease) as per Consolidated Consent And Authorization issued by GPCB.</p> <p>Review of treated STP effluent at plant and labour colony monitoring records from July to Nov'15 reveals compliance to total suspended solids. BOD levels were observed to be to be in compliance at plant & labour colony STPs except for labour colony STP in Aug'15. Total residual chlorine values were found to be exceeding limits given in Consolidated Consent and Authorisation issued by GPCB by 90%.</p> <p>Water from ash pond is being recirculated in the ash recirculation system within the plant. The treated waste water is being used for irrigation of plantation in plant area.</p>
41.	Set-up a suitably designed ash pond to mitigate risk of ground water contamination		Ash pond was developed with impervious material lining to prevent any ground water contamination. The quality of ground water near ash pond area will be assessed by CGPL through regular monitoring of the bore wells installed within the project site.	<p>Ash pond is lined with impervious material to prevent any ground water contamination. The quality of ground water near ash pond area is being assessed by CGPL through regular monitoring of the bore wells installed within the project site. The ground water monitoring indicates generally parameters like total dissolved solids (TDS), Total Alkalinity, chloride iron, fluoride, turbidity, etc. exceed IS 10500 drinking water standards.</p> <p>High TDS and chloride concentration in the bore well samples is characteristic of the ground water quality in this region and in line with the baseline quality</p>

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42.	Ensure lining of sea water intake and outfall open channels on the onland stretches, to prevent groundwater salinity increase		Sea water intake and outfall channels have been lined, to prevent any ground water salinity ingress	Sea water intake and outfall channels have been lined, to prevent any ground water salinity ingress
43.	Implement measures (detailed in EMP) for storage, handling and disposal of hazardous wastes, other wastes and for prevention of leachates (from coal yard and ash pond) contaminating ground water		CGPL obtained valid hazardous waste authorization from GPCB as occupier of the facility generating the hazardous wastes generated due to the construction activities. Also as required under the provision of Hazardous Waste (Management, Handling & Transboundary Movement) Rules 2008 CGPL will continue to submit annual returns specifying details of hazardous waste disposal to GPCB in prescribed format. With respect to storage of hazardous waste, separate hazardous waste storage area has been constructed as per Hazardous Waste Rules, necessary display of danger signages, provisions of fire-fighting equipment, etc. have been made available to address emergency situations and comply with consent/permit requirements.	CGPL possess valid hazardous waste authorization from GPCB as occupier of the facility generating the following hazardous wastes viz. used oil, discarded containers drums and barrels, spent ion exchange resins containing toxic metal, chemical sludge from waste treatment, waste residue containing oil, spent solvents, copper etching residues and discarded asbestos. Also as required under the provision of Hazardous Waste (Management, Handling & Transboundary Movement) Rules, 2008, CGPL is continuing with the submission of annual returns specifying details of hazardous waste disposal to GPCB in prescribed format. Used oil is disposed through M/s N. K. Lubricants Pvt. Ltd. and waste residue containing oil is being disposed through Saurashtra Enviro Projects Pvt. Ltd. ETP sludge (identified as hazardous waste under Hazardous Waste Rules) generated from effluent treatment is being disposed in lined ash pond instead of the GPCB authorized TSDF facility of M/s SEPPL as required under the waste authorization issued. The ETP sludge has been analyzed to be of non-hazardous nature and the same has been communicated to GPCB and necessary

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				<p>amendment in the waste authorization is pursued from GPCB.</p> <p>Hazardous waste storage area has necessary display of danger signages and provisions of fire-fighting equipment have been made available to address emergency situations and comply with consent/permit requirements.</p> <p>Hazardous waste generation and disposal records along with Annual returns – Form 4 were verified during site visit.</p> <p>Biomedical waste generated from the onsite CGPL Occupational Health Centre is being managed through authorized bio-medical waste disposal facility. CGPL has valid authorization for storage, handling and disposal of bio-medical waste. Colour coded bio-medical waste bins are provided at health centre.</p>
44.	Implement measures (detailed in EMP) to minimize fugitive emissions both during construction and operation		During construction phase sufficient measures were taken to minimize fugitive dust emissions, including paving of roads, water sprinkling, and material storage covers usage. During operation phase, the fugitive emissions of coal dust will be minimized using continuous water sprays, coal conveyor hoods, three tier plantation along the boundary of the plant, etc.	<p>The fugitive emissions of coal dust is minimized using continuous water sprays, coal conveyor hoods, 9 m high wind barrier screens in plant area closer to Vandh village, three tier plantation along the boundary of the plant, sprinkling and use of sprays rain gun in the areas where bottom ash is temporarily stored on the edge of ash pond before pushing them into the ash pond.</p> <p>In line with EC requirement, 417.89 Ha area has been covered under green belt and thus 1/3rd of the total project area (1242 ha) is covered under green belt. Till March'15, around 10, 44,728 saplings have been planted.</p> <p>Further to reduce possibility of fugitive dust</p>

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					emission due to closed coal conveyor near Vandh village, around 3 Km of stretch of closed conveyor is being replaced with pipe conveyor system. The work on the same is initiated and expected to be completed by April'16.
45.	Allot 241 ha. in total for ash pond area		CGPL has identified around 143 Ha. of land within plant premises for ash pond. Ash pond is designed in such a way that in case there is no utilization of fly ash and bottom ash upto commissioning of unit 5 and thereafter 50% utilization of fly ash, the designed ash pond will get filled up in 9.25 years. However, CGPL has a regulatory target of ensuring 100% usage within 4 years, due to which area for storage requirement is now limited and 143 ha will be sufficient.	CGPL has identified around 143 Ha. of land within plant premises for ash pond. Ash pond is designed in such a way that in case there is no utilization of fly ash and bottom ash upto commissioning of unit 5 and thereafter 50% utilization of fly ash, the designed ash pond will get filled up in 9.25 years. However, CGPL has a regulatory target of ensuring 100% usage within 4 years, due to which area for storage requirement is now limited and 143 ha will be sufficient.	
46.	Dispose unutilized fly ash and bottom ash in slurry form to the ash pond, located within the plant boundary.		Unutilized fly ash and bottom ash in slurry form will be disposed to the ash pond located within the site.	Unutilized fly ash and bottom ash in slurry form is disposed to the ash pond located within the site.	
47.	Outline and implement a plan for ensuring 100% fly ash utilization within 9 years of commissioning including through use in cement and FAL-G brick manufacture and possibly other applications		CGPL plans for ensuring 100% fly ash utilization within 9 years of commissioning including through use in cement and other feasible applications	The initial utilization of fly ash was below 10%. Review of ash utilization records for the 2014-15 reveals that around 15% is through sale to Sanghi and Binani cement. But during the current year 2015-16, fly utilisation has increased significantly to reach 65%. The fly ash is mainly sold to cement units like Sanghi and Binani cement. The fly ash utilisation report for FY 2014-15 was submitted to MoEF&CC & GPCB. CGPL is working rigorously for utilisation of	

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				bottom ash also. Discussions are being done with overseas parties and National Highway Authority (NHI) for improving ash utilisation.
48.	Include appropriate contractual provisions, requiring the ships carrying coal for the project meet all applicable host country laws, IMO conventions and MARPOL requirements		Contractual provisions are included in coal sourcing, to meet environmental standards of IMO	Contractual provisions are included in coal sourcing, to meet environmental standards of IMO
49.	Ambient noise levels predicted to meet IFC's ambient noise level standards		Noise levels are monitored regularly at the receptor locations and plant premises and results are compared to noise standards.	Noise levels are regularly monitored at nearby villages. The analysis of noise monitoring results from July to Nov'15 reveals that day time noise levels were found to be in compliance with the day time noise standards with slight exceedance noted for Vandh (in Sept, Oct & Nov'15), Tragadi (in Aug'15) and Moti Khakhar villages (in Aug, Oct & Nov'15). The night time noise levels were in compliance with night time standards expect for Tunda (in July & Sept'15) and Moti Khakhar (from July to Nov'15) villages. CGPL has adopted necessary control measures viz. use of closed conveyors, peripheral green belt development etc. and is also carrying out periodic monitoring to assess the efficiency of the management measures and plan necessary intervention, as may be required. For noise monitored within project premises all values were found to be complying with

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				the day and night time noise standard specified in the CC&A.
50.	<p>Baseline ambient air quality levels of the site and its surrounding villages assessed to be good. Project's impacts at 8 surrounding villages were assessed, and the resultant levels are predicted to be within the National Ambient Air Quality Standards (NAAQS) of India. The incremental impacts of NO₂ and SPM are well below the relevant NAAQS. The incremental impacts of SO₂ (24-h Max) are also small, maximum 30 µg/m³ at two of the eight villages, whereas at other six villages the impacts are predicted to be in the range of 0 to 19 µg/m³ as compared with the NAAQS limit of 80 µg/m³. Annual average SO₂</p>		<p>CGPL will continue to assess the potential impacts of the project construction activities on ambient environment through monthly monitoring of air quality at various receptor locations. The receptor locations have been selected based on their proximity to the project facilities predominant wind direction and topography.</p>	<p>CGPL continues to assess the potential impacts of the project operations on ambient environment through monthly monitoring of air quality at various receptor locations. The receptor locations have been selected based on their proximity to the project facilities viz. coal conveyor, coal stockpile etc, predominant wind direction and topography.</p> <p>Review of village level ambient air quality monitoring data (June to Nov'15) reveals compliance to National Ambient Air Quality Standards (NAAQS) except for PM₁₀ (average values in range of 76.5-118.4 µg/m³) which is found to exceed the standard (100 µg/m³) specified for this pollutant at Vandh, Nana Bhadiya and Moti Khakhar village.</p> <p>This is typical for coastal locations in this region and also attributed due to the proximity of some villages viz. Vandh to the coal conveyors of Adani and CGPL thermal power plants. CGPL has adopted necessary control measures viz. use of closed conveyors, replacement of closed conveyor with pipe conveyor near Vandh village, peripheral green belt development etc.</p> <p>The ambient air quality within project premises was also found to be in compliance to the NAAQS for PM₁₀. PM_{2.5}, NO_x & SO₂.</p>

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	incremental impact in all the villages is between 0 – 3.2 µg/m ³ , much smaller than the NAAQS limit of 60 µg/m ³ .			
51.	Cumulative air quality impact assessment predicts the resultant levels considering the CGPL project and the Phase-I (2 x 330 MW) of Adani Power will be in compliance with the NAAQS		Cumulative Air Quality Impact assessment was conducted prior to the project including phase I of Adani power. Moreover, Cumulative Air Quality Impact Assessment has been conducted in 2013 for CGPL existing capacity, Adani existing capacity and planned expansion for CGPL.	
52.	Cumulative impacts with Adani Power Project (Phase II: 2 x 330MW+ 2 x 660MW = 1,980MW) is likely to be reviewed by Ministry of Environment and Forests, Gol			
53.	Installation of online stack emission monitoring and continuous ambient air quality monitoring stations, in addition to twice a week monitoring programs		CGPL has in place fully equipped online stack emission as well as continuous ambient air quality monitoring stations. Monitoring programs and facilities also exist for manual monitoring of stack emissions as well as ambient air.	CGPL has in place fully equipped online stack emission as well as continuous ambient air quality monitoring stations. Monitoring programs and facilities also exist for manual monitoring of stack emissions as well as ambient air.
54.	Construct infrastructure and use equipment that	PS4: Community health, safety and security	Community environment, health, and safety will be protected by use of competent technology and service providers for design,	Community environment, health, and safety is protected by use of competent technology and service providers for

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
	meet good industry practices		construction, operation, and maintenance	design, construction, operation, and maintenance
55.	Design, construct, operate, maintain and monitor the power plant, to ensure minimal community, environment, health and safety impacts.			
56.	Ensure through appropriate contractual provisions that impacts on community environment, health and safety are minimized			
57.	Ensure through appropriate risk assessment, engineering and management measures, that risks associated with the plant are contained within the plant premises and societal risks are within international criteria/best practice norms.			
58.	Ensure that the supply and construction		Management of contractors with respect to their EHS aspects was ensured through the work orders issued, and active safety	During operation phase, management of contractors with respect to their EHS aspects is ensured through the work orders

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	contractors adopt good SEHS practices during construction and in particular ensure that its employees and contractor train equipment operators and drivers in safe driving techniques;		supervision as well on-site support activities such as "Safety time-out", "tool box talks", "drills", "behavioural changes through engagement of NGO".	issued, active safety supervision, documentation control as well on-site support activities such as "tool box talks", "drills", etc.
59.	Develop a materials movement plan to ensure that vehicle movement during construction has minimal impact on daily life patterns of nearby communities;		All equipment suppliers / transporters were required to provide a logistic plan to reach the site, and monitoring of adherence to these plans was ensured to minimise any safety risks associated with material movement	Wherever required, equipment suppliers / transporters are required to provide a logistic plan to reach the site, and monitoring of adherence to these plans is ensured to minimize any safety risks associated with material movement
60.	Undertake appropriate measures to reduce fugitive emissions from storage and transport of excavated earth and other construction material;		During construction phase sufficient measures were taken to minimise fugitive dust emissions, including paving of roads, water sprinkling, usage of material storage covers	In operation phase, no major earth work is involved. For any construction involving earth work, appropriate measures to reduce fugitive emissions are taken like usage of material storage cover, etc.
61.	Periodically monitor ambient air quality and also noise levels in potentially affected communities/villages , and implement mitigation measures where required.		CGPL will assess the potential impacts of the project operations on ambient environment through monthly monitoring of air and noise quality at various receptor locations. The receptor locations have been selected based on their proximity to the project facilities viz. coal conveyor, coal stockpile etc, predominant wind direction and topography in consultation with GPCB and the map of	Noise levels are regularly monitored at nearby villages. The analysis of noise monitoring results from July to Nov'15 reveals that day time noise levels were found to be in compliance with the day time noise standards with slight exceedance noted for Vandh (in Sept, Oct & Nov'15), Tragadi (in Aug'15) and Moti Khakhar villages (in Aug, Oct & Nov'15). The night

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			<p>AAQM locations have been submitted to GPCB. CGPL will adopt necessary control measures to mitigate any affect on air and noise quality due to project, wherever required.</p>	<p>time noise levels were in compliance with night time standards expect for Tunda (in July & Sept'15) and Moti Khakhar (from July to Nov'15) villages.</p> <p>CGPL has adopted necessary control measures viz. use of closed conveyors, peripheral green belt development etc. and is also carrying out periodic monitoring to assess the efficiency of the management measures and plan necessary intervention, as may be required.</p> <p>For noise monitored within project premises all values were found to be complying with the day and night time noise standard specified in the CC&A.</p> <p>CGPL continues to assess the potential impacts of the project operations on ambient environment through monthly monitoring of air quality at various receptor locations. The receptor locations have been selected based on their proximity to the project facilities viz. coal conveyor, coal stockpile etc, predominant wind direction and topography.</p> <p>Review of village level ambient air quality monitoring data (June to Nov'15) reveals compliance to National Ambient Air Quality Standards (NAAQS) except for PM10 (average values in range of 76.5-118.4 µg/m3) which is found to exceed the standard (100 µg/m3) specified for this pollutant at Vandh, Nana Bhadiya and Moti Khakhar village. This is typical for coastal locations in this region and also attributed due to the proximity of some villages viz. Vandh to the coal conveyors of Adani and</p>

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				<p>CGPL thermal power plants. CGPL has adopted necessary control measures viz. use of closed conveyors, replacement of closed conveyor with pipe conveyor near Vandh village, peripheral green belt development etc.</p> <p>The ambient air quality within project premises was also found to be in compliance to the NAAQS for PM10. PM2.5, NOx & SO2.</p>
62.	Provide appropriate amenities/facilities for labor during construction		Labour camps with all the required amenities to ensure safety, hygiene, sanitation, and recreation of the workers were set-up and maintained during the construction phase	Labour colony is maintained with appropriate amenities/facilities to ensure safety, hygiene, sanitation, and recreation of the workers
63.	Provide, or require its contractors to ensure that, to the extent possible, members of local community are employed as construction laborers		CGPL played an active role to ensure that it's contractors and sub-contractors engage local labour during construction as well as in the non-core activities of operation & maintenance.	Database of Project Affected Families is linked to the local level employment and business opportunities being provided directly and indirectly by CGPL. This system of linking and tracking employment / business opportunity benefits is operationalized using track sheets. Software based system to systematically track status of employment requests from PAVs, PAFs is operational. HR Software (Dhaksha) has been installed in the CIC which is a step forward in this direction.
64.	Ensure labor camps have appropriate facilities and amenities including housing, toilets, washing and cleaning water, potable drinking water and cooking fuel; treated sanitary		Labour camps with all the required amenities to ensure safety, hygiene, sanitation, and recreation of the workers were set-up and maintained during the construction phase. Labour camps were also provided with STPs for treatment and safe discharge / use of wastewater generated from these camps.	Labour camps with all the required amenities to ensure safety, hygiene, sanitation, and recreation of the workers are maintained during the operation phase. Labour camps are also provided with STPs for treatment and safe discharge / use of wastewater generated from these camps.

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
	waste water meets IFC/WBG requirements prior to discharge; and potential host community impacts on account of influx of labor are assessed and managed			
65.	Develop a labor influx management plan within a timeframe agreed with IFC		Labour influx management plan was prepared and all the relevant measures were implemented on-site to ensure that the neighbouring communities are caused least disturbance and conflicts are minimized.	Labour influx management plan was prepared during pre-operation phase and all the relevant measures were implemented on-site to ensure that the neighboring communities are caused least disturbance and conflicts are minimized
66.	Assess impacts of influx of labor and implement measures to minimize risk of community exposure to disease due to influx of laborers including: ensuring that appropriate medical facilities are available for its labor, employees and contract labor; that all its employees and laborers undergo periodic health check up including for HIV/AIDS; and other measures to control		Separate utilities and sanitation facilities were ensure for all the workers, along with a medical facility and periodic health check ups	Separate utilities and sanitation facilities are provided for all the workers, along with a medical facility and periodic health check ups

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
	disease vectors.			
67.	Develop and implement procedures within a timeframe agreed with IFC for ensuring that past records of security personnel employed are screened; security personnel have clear objectives and permissible actions laid out; security personnel are trained in avoidance of human rights violations, use of fire arms and handling various situations with clear procedures; security incidents are recorded, investigated and corrective action implemented; bona fide complaints against security personnel are investigated/disciplinary actions implemented; and there is a grievance mechanism for aggrieved members		Security personnel were regularly trained and appraised for the need of empathy towards the neighbouring communities and avoid any conflicts. Behavioural training of the security staff was specifically ensured. A detailed screening procedure for security personnel is deployed by CGPL, and trained in use of fire arms, handling conflict situations, recording security incidents. The site management also investigates and will continue to investigate security incidents, and takes disciplinary actions in response to grievances from local communities on the security personnel.	Security personnel were regularly trained and appraised for the need of empathy towards the neighbouring communities and avoid any conflicts. Behavioural training of the security staff was specifically ensured. A detailed screening procedure for security personnel is deployed by CGPL, and trained in use of fire arms, handling conflict situations, recording security incidents. The site management also investigates security incidents, and takes disciplinary actions in response to grievances from local communities on the security personnel.

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
	of community or employees in the event of a violation of the code for security personnel; Evaluate adoption of the UK Voluntary Principles on the Use of Security Forces as suggested in the Guidance Note for PS4.			
68.	Prepare an emergency preparedness and response plan (EPRP) both for onsite and offsite emergencies; communicate the EPRP to stakeholders and also link the EPRP to the district EPRP; undertake drills on emergency response including participation of nearby communities; and continually improve the EPRP based on outcome of the drills.		Both onsite and offsite ERPs are prepared and linked with district level plans. Periodic drills will be conducted to improve implementation arrangements for emergency situations	Both onsite and offsite ERPs are prepared and implemented, linked with district level plans, and periodic drills conducted to improve implementation arrangements for emergency situations
69.	Implement procedures, on an ongoing basis, to		Community engagement is ensured and feedback from the local communities is sought to identify and remediate community	Community engagement is ensured and feedback from the local communities is sought to identify and remediate community

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	identify and remediate potentially adverse impacts on community environment, health and safety.		risks from the project.	risks from the project. Communities of one of the villages "Vandh" adjoining the project facility were found to be facing adverse impacts due to coal dust from the internal and external coal handling facilities. Public consultations, dissemination of information on further mitigation alternatives, and making alterations in the mitigation actions of the project has demonstrated implementation on an ongoing basis. The guiding principles of the strategic intent for CGPL's sustainability programmes which has been prepared lays down community engagement as a key aspect of CGPL's strategy for sustainability.
70.	Private land acquisition will meet PS 5 provisions.	PS5: Land and Involuntary Resettlement	Private land acquisition has followed a negotiated settlement principle, and followed all the PS5 provisions, including redress of grievances	Private land acquisition has followed a negotiated settlement principle, and followed all the PS5 provisions, including redress of grievances
71.	Implement measures to facilitate members of the affected households in getting contract employment during the construction phase		Database prepared for PAFs and operationalization of the system of linking and tracking PAF wise employment and business opportunity benefits provided, is undertaken. Around 55% of the employment provided to native population of Gujarat is for the population from Kutch and those belonging to the region. The completed construction phase of the project has benefitted the PAFs in various ways, including business opportunities in terms of shops near project work areas, contracts for housekeeping, green belt development, hiring of vehicles, construction of community infrastructure. CGPL has now framed and finalized the —Rules for Business Opportunity to Local	Database of Project Affected Families is linked to the local level employment and business opportunities being provided directly and indirectly by CGPL. This system of linking and tracking employment / business opportunity benefits is operationalized using track sheets. Software based system to systematically track status of employment requests from PAVs, PAFs is operational. HR Software (Dhaksha) has been installed in the CIC which is a step forward in this direction.

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			Communityll, that governs provision of livelihood opportunities to PAPs, PAVs through contracts, training, direct / indirect employment.	
72.	Develop and implement measures (in consultation with affected communities) to mitigate identified impacts to ensure that no affected household is left worse off on account of the project		Measures to mitigate the loss of grazing land to meet the land requirement of the project have been implemented and will be continued during operation phase for restoration of livelihood related to grazing. The compensation to the Project Affected Families for the land requirement of the project is supplemented with measures including provision of direct as well as indirect employment and contractual opportunities, as well as including PAFs as part of SHGs being promoted, for ensuring further economic advantages. Measures to mitigate the access impact on fisher folk have also been implemented	Measures to mitigate the loss of grazing land to meet the land requirement of the project have been implemented and continued during operation phase for restoration of livelihood related to grazing. The compensation to the Project Affected Families for the land requirement of the project, is supplemented with measures including provision of direct as well as indirect employment and contractual opportunities, as well as including PAFs as part of SHGs being promoted, for ensuring further economic advantages. Measures to mitigate the access impact on fisher folk have also been implemented. While the impact on fisher folk due to the project is being assessed in detail, various programs are being implemented to ensure better economic opportunities for the fisher folk surrounding the project. Under livelihood enhancement a number of activities related to enhancement of income, such as distribution of equipment related to fishing and marketing of catch, provision of basic amenities including health care, reduction of indebtedness through microfinance and distribution of material and equipment to reduce loans and debts, civil infrastructure such as cc roads, sanitation units, RO water, solar lights for public area and fishing boats, Solar dryer as demonstration for fish drying,

S. No.	Lender's requirement E&S	Reference to E&S Performance Standards Guidelines /	Status - Pre-Operation Phase	Status - Operation Phase
				<p>etc. Social assessment of communities around the project has been conducted to capture the trends in socio-economic changes that the project area has experienced due to CGPL and other concurrent industrial developments started in the project area. Key findings and recommendations mentioned in the report can be checked or verified for the nature of change mentioned and the same can be incorporated in the Annual business plan for 2015-2016.</p>
73.	Mitigate the impacts on account of private and public land acquisition by (a) Work with Government of Gujarat (GoG) and the affected communities, to develop and implement solutions to ensure that livelihood of project affected communities is not adversely affected. This may include (but may not be limited to) working with GoG to facilitate making available alternate and suitable equivalent grazing and other		The "Kanthi area livelihood program" is continuing to be run as a measure to mitigate loss of grazing land as part of meeting the project land requirement. Under this program, gaushalas have been created and operated, through which fodder is being distributed to more than 4000 nos. of cattle in the adjoining villages. These gaushalas have been additionally supported with infrastructure such as internal roads, cattle trough, boundary wall, Water trough, bifurcation wall and weigh bridge. CGPL is exploring opportunities such as promoting drip irrigation among the surrounding communities, to enhance agricultural yield.	Fodder supply continued in ten villages, including both the gaushalas, and is benefitting more than 9000 cattle. Dry and green fodder distributed in gaushalas. The CR team of CGPL is currently addressing this issue with a two-pronged approach of long and short term measures. <p>As a short term measure the aim is to reduce at least 25% of the existing cost of fodder procurement through</p> <ul style="list-style-type: none"> • Reducing fodder wastage by stricter control on fodder distribution • Procuring fodder from small farmers in the vicinity at a negotiated cost • Optimizing cost by procuring low cost varieties of fodder without compromising on quality • Harvesting grass (dry fodder) within CGPL premises which is expected to meet substantial requirement of dry fodder. <p>The long term proposed interventions to be</p>

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	<p>land for the project affected villages. Work with affected communities to enhance productivity of and yield from the balance grazing and wasteland available in the project affected villages;</p> <p>(b) Work with affected communities and productivity of and yield from balance private agricultural land in the project affected villages</p>			<p>taken up for making the Gaushalas sustainable are as follows:</p> <ul style="list-style-type: none"> • Fodder support to gaushalas and innovations for sustainability and cost optimization • Form support and develop effective linkages with Producer Companies for procurement of fodder • Gauchar land development (planned with Panchayat) • Demonstration of harvesting different varieties of grass and fodder within plant premises; accessing dry fodder • Selection of fodder crops that withstand high salinity • Organize land for growing fodder • Interaction with cattle owners for cost sharing and enhance community ownership and trust <p>Others:</p> <ul style="list-style-type: none"> • Brucellosis Control Project in 4 blocks of Kutch which addresses a significant cattle health issue of the region. • Periodic Camel and cattle vaccination camp <p>Partnered with reputed agencies for attaining the sustainability in the Gaushala Initiatives namely Parjanya Ecology, Abhiyan</p>
74.	Compensate structures, other assets (bore wells, pump house, wells and cattle shed) and		Structures and other assets were compensated using standard valuation methodologies using data from government departments	Structures and other assets were compensated during pre-operation phase using standard valuation methodologies using data from government departments

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	trees, impacted due to land acquisition, based on valuation methodologies provided by Horticulture Department and Public Works Department			
75.	GRM to be established and operationalised		A commitment was made by CGPL to improve the GRM through the implementation of an online computerized Grievance Redressal Management System which is now under implementation. GRM currently being followed is thus stronger than the one being previously followed. Currently oral feedback or replies are made to the person raising the grievance. The GRM is in place and periodically monitored by CGPL management and updated accordingly.	Grievance Redressal Management System is working satisfactorily and CGPL has implemented T-bits software for managing the grievances received, actions taken, and actions currently in progress or pending to enable a systematic communication and documentation
76.	Plan and implement suitable measures for temporary and permanent livelihood restoration		Temporary and permanent livelihood restoration will continued to be ensured through gaushalas, employment and local procurement opportunities. Impact on fishing communities will be re-assessed to ascertain any particular impacts and will be mitigated in accordance with PS provisions.	Temporary and permanent livelihood restoration is being ensured through gaushalas, employment and local procurement opportunities. CGPL is running a program called "Sagarbandhu" designed to develop fishermen community through strengthening of village institutions, livelihood related trainings, infrastructure development, addressing the basic needs viz. education, health and convergence with government schemes
77.	Enhance employability and enable affected households seek alternate sources of		Mechanism has been placed by which local youths could be employed through the contractors which has increased the satisfaction level among the community. People who have been employed through	The framed "Rules For Business Opportunity to Local Community" governs operationalization of CGPL's commitment to provide livelihood opportunities to PAP's & PAV's through Contracts, training and

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	livelihood/income enhancement through skill development training		contractors and sub-contractors also enhance their skill sets through the exposure that they receive while working, thereby enhancing their employment opportunities elsewhere after completion of contractual engagement on this project	direct and indirect employment for PAFs and PAVs. CGPL is running a program called "Sagarbandhu" designed to develop fishermen community. CGPL is continuing to create new SHGs and support the existing SHGs to cater to the idea of women empowerment of rural women. As of now, a total of around 50 SHGs have been formed with total of around 600 members. Several SHGs received revolving fund from the Government and interacted with around 70 members for discussion / training on various aspects of loan processes, account opening, handicraft work. Skill development training for the SHG have been initiated viz. Beauty culture, etc.
78.	Seawater (for once through condenser cooling) intake open channel (80 m width at base at 3 m below chart datum) proposed in the Kotdi creek and an outfall/discharge channel (60 m base width at 1 m below chart datum) proposed in the Mudhwa creek. Seawater intake required is a maximum of 594,200 m ³ /hr, and the	PS6: Biodiversity Conservation and Sustainable Natural Resource Management	Design basis changed for sea water intake and outfall channel. The environmental impacts have been re-assessed for these changes and the mitigation measures implemented	Design basis changed for sea water intake and outfall channel. The environmental impacts have been re-assessed for these changes and the mitigation measures implemented

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79.	channel designed for 620,000 m3/hr. Capital dredging expected to generate as much as 4.1 million m3 of dredge spoil			
80.	Identify a site for disposal of dredge spoil, and develop a dredge spoil disposal plan both for capital and maintenance dredging. This is to be based on recommendations of a reputed independent consultant and with approval of Gujarat Maritime Board and other regulators		Dredge spoil disposal used along the embankment of outfall channel undertaken after obtaining approval from regulatory authorities	Dredge spoil disposal used along the embankment of outfall channel undertaken after obtaining approval from regulatory authorities
81.	Rapid Marine Impact assessment undertaken to assess the impacts of sea water intake and thermal discharge from/into the creeks, indicates that material adverse impacts may not be expected on account of the project, if a management plan		The intake channel has been suitably oriented and site slopes designed based on the model studies undertaken to minimize possible changes in the pattern of littoral drift locally. Construction period on the sea side was limited and spillage avoided to minimize any temporary destruction of macro-benthos along the corridors selected for sea water intake and discharge. No temporary colonies were established in the CRZ area followed by a general clean-up of discarded materials during construction phase. Dredge spoil generated during excavation of the channel is	Periodic monitoring of the marine environment and ecology is continuing. Dredge spoil generated during excavation of the channel is used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets placed across the intake channel along with moving screens to avoid destruction of marine organisms. CGPL has completed mangrove afforestation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
	suggested in the RMEIA is appropriately implemented		used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets placed across the intake channel along with moving screens to avoid destruction of marine organisms. Attainment of near ambient temperatures and salinity is being ensured and monitored.	of land and is conducting experimental mangrove plantation at Modhva beach near outfall channel. Periodic monitoring of the marine environment and ecology is continuing. CGPL has completed mangrove plantation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha of land. Periodic monitoring of the marine environment and ecology is will be continued.
82.	Maintain the temperature difference between intake and discharge points below 4 Celsius, and meet World Bank environmental guideline of 3 degree Celsius at the edge of the mixing zone.		Monitoring of temperature difference between intake and outfall will be done to ensure complies with the committed level. Model confirmatory study will be conducted to confirm the same, as required.	The project has been designed based on once through cooling system with the cooling being discharged into the sea through a 7.3 km long outfall channel. Further such cooling water discharge location has been selected based on the Thermal and Salinity modeling study undertaken by NIO. Hydraulic design and modelling studies has been undertaken by HR Wallingford and Marine Environment Impact Assessment as undertaken by NIO. CGPL has engaged NIO for conducting monitoring and model conformity studies of the condenser cooling water discharge system have been completed in Dec'13. The study concluded that with the continuous release of return seawater effluent at temperature 7°C above ambient in the outfall channel, near ambient conditions were being attained at a distance of 500 m from the channel mouth. This distance is much shorter than prediction of 3 km by HR Wallingford based on the modeling studies conducted by them prior

S. No.	Lender's E&S requirement	Reference to E&S Performance Standards / Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
				<p>to the establishment of the CGPL power plant.</p> <p>NIO recommended that for more reliable conclusions, similar study should be conducted during the critical season i.e. summer (April-May) when air and water temperatures are high in the arid region of Kachchh. On these lines CGPL had asked NIO to conduct the similar study in summer (April-May'15). Reports of the same are awaited from NIO.</p> <p>The online monitoring of cooling water temperature near ash silo bridge and manual monitoring near retaining wall from July to Nov'15 reveals average temperature difference from ambient seawater temperature of 4.89 and 3.7°C respectively. It is to be noted, that retaining wall is located 3.3 km prior to the end of dredged outfall channel. This is found to be in compliance with the temperature difference standard of 7°C specified at the cooling water discharge point by EC Amendment condition dated 5th April'07</p>
83.	RMEIA indicates that high tidal movements, uneven topography and unusually strong currents make trawling or gill-netting for fish difficult and risky in the creeks		Both the statements were confirmed during operational monitoring during the audit carried out by SENES and lender's visit.	Both the statements are confirmed during operational monitoring during the audit carried out by SENES and lender's visit.
84.	RMEIA indicates that no large scale			

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	commercial fishing operations prevail in these shallow creeks except for minor shore based hand-net and gill-net operations			
85.	RMEIA indicates that mangroves are not likely to be impacted on account of the open channels		Marine ecological monitoring done by NIO during Marine Impact Assessment confirms the area being devoid of any mangroves, thereby not resulting in any kind of damage.	CGPL has completed mangrove afforestation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha of land thereby complying with the CRZ clearance requirement.
86.	Carryout additional modeling through reputed independent expert organization with the following objectives: - the activity does not affect the flow regime (of the creeks/gulf); - to determine the intake and outfall locations; - to determine the mode for drawl of water; - hydraulic and thermal regime is not affected; and - Sensitive areas such as mangroves, corals and aquatic		H.R. Wallingford engaged for undertaking modelling exercise and NIO engaged for Marine Environment Impact assessment for intake and outfall locations as well as discharge modes selected accordingly to minimise any adverse material impact on the coastal and marine environment.	Monitoring and model conformity studies of the condenser cooling water discharge system have been completed by CGPL through NIO with field study completed in Dec'14. The study concluded that: subsequent to the continuous release of return seawater effluent at temperature 7°C above ambient in the outfall channel, near ambient conditions were being attained at a distance of 500 m from the channel mouth. This distance is much shorter than prediction of 3 km by HR Wallingford based on the modeling studies conducted by them prior to the establishment of the CGPL power plant. As per recommendation of this study another similar study was undertaken in summer (April-May) when air and water temperatures are high in the arid region of Kutch. Reports of the same are awaiting. Marine ecological monitoring done by NIO during Marine Impact Assessment confirms the area being devoid of any mangroves,

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	flora and fauna are not affected.			thereby not resulting in any kind of damage. CGPL has completed mangrove afforestation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha of land thereby complying with the CRZ clearance requirement
87.	<p>Implement a management plan based on the outcome of the Rapid Marine EIA and the additional studies to be undertaken. RMEIA recommends:</p> <ul style="list-style-type: none"> - placement of suitable nets across the intake channel and moving screen at the intake with suitable washing mechanism, - wide and deep channel causing only weak currents, both to reduce impingement and entrainment, and - allowing the local fishing community to fish in the channel. 		<p>The intake channel has been suitably oriented and site slopes designed based on the model studies undertaken to minimize possible changes in the pattern of littoral drift locally. Construction period on the sea side was limited and spillage avoided to minimize any temporary destruction of macro-benthos along the corridors selected for sea water intake and discharge. No temporary colonies were established in the CRZ area followed by a general clean-up of discarded materials during construction phase. Dredge spoil generated during excavation of the channel is used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets placed across the intake channel along with moving screens to avoid destruction of marine organisms. Attainment of near ambient temperatures and salinity is being ensured and monitored.</p>	<p>CGPL has taken extensive measures to ensure that the aquatic health of the outfall channel is benign. For this purpose concurrent Cage Fishing projects have been adopted and the performance of this initiative has been found satisfactory. Moreover, regular monitoring of physical and chemical parameters of the water sample of the outfall channel is conducted. Dredge spoil generated during excavation of the channel is used along the channel embankments ensuring there is no dumping in the intertidal areas. Nets remains placed across the intake channel along with moving screens to avoid destruction of marine organisms. Attainment of near ambient temperatures and salinity of water discharge is being ensured and monitored. Mangrove plantation initiatives completed at Kantiyajal, Bharuch at 1000 Ha. Periodic monitoring of the marine environment and ecology is continuing. Further, BNHS is also conducting a study on sea turtle monitoring since 2011. Phase II sea turtle monitoring has been conducted for 2012-14. Phase III monitoring by BNHS has commenced from March 2015 for three years. Till date there has been no evidence</p>

S. No.	Lender's requirement	E&S Performance Standards Guidelines	Status - Pre-Operation Phase	Status - Operation Phase
				of turtle nesting in the coast line fronting the intake and outfall channel.
88.	Ensure compensatory afforestation for the forest land acquired for the project (130 ha)		Compensatory afforestation undertaken as required undertaken for the forest land acquired for the project	Compensatory afforestation as required undertaken for the forest land acquired for the project
89.	Undertake mangrove plantations and implement measures to conserve mangroves in the vicinity of the project site		NIO in its Marine Impact Assessment Report has declared the area of outfall channel to be devoid of mangroves. However to meet its commitment, CGPL has completed mangrove afforestation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha of land thereby complying with the CRZ clearance requirement.	NIO in its Marine Impact Assessment Report has declared the area of outfall channel to be devoid of mangroves. However to meet its commitment, CGPL has completed mangrove afforestation along with Gujarat Ecological Commission and Kantiyajal Tavar Vikas Samiti (KTVS) at coastal village of Kantiyajal encompassing 1000 ha of land thereby complying with the CRZ clearance requirement.
90.	Implement procedures, in accordance with PS8 provisions so as to mitigate the impact of public land acquisition that may result in loss of access to a village fair site, playground or sites of cultural/community importance to the affected communities.	PS8: Cultural Heritage	While there has been no cultural related impacts due to the land procurement for the project, to promote cultural and sports among the village youth, an integrated sports complex will be constructed and operationalized in Tunda village, where major annual sports events will be organized. Similarly, Vartika project for promotion of local handicrafts will be promoted under the SHG program. A traditional structure of "Bunga" housing system is also popularized through construction of Community Information Centre and CSR field office by CGPL	To promote cultural and sports among the village youth, an integrated sports complex has been constructed and operationalized in Tunda village, where major annual sports events are being organized. Similarly, Vartika project for promotion of local handicrafts has been initiated under the SHG program. A traditional structure of "Bunga" housing system is also popularized through construction of Community Information Centre and CSR field office by CGPL. CGPL has also provided civil infrastructure such as community halls, enclosure of cremation grounds, anganwadi walls, panchavati garden, cattle trough, etc to the PAVs. As land and public spaces become

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				<p>scare and liable to be encroached, the villagers have asked for enclosure of community cultural property such as cremation ground, entrance gate to village demarking the area of the village and village amenities such as government schools. All such activities have been planned and implemented through the panchayat by local vendors to ensure that the communities are involved and part of the decision making and implementation.</p>
91.	<p>Implement in accordance with PS8 provisions a chance find procedure including for finds of archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values, as well as unique natural environmental features that embody cultural values, such as sacred groves</p>		<p>A chance find procedure was formulated as part of the construction related procedures, and implemented on-site. No such structure / natural feature / article was encountered.</p>	<p>A chance find procedure was formulated as part of the construction related procedures, and implemented on-site. No such structure / natural feature / article was encountered.</p>