




Draft Report: Independent Environmental, Health, Safety and Social Compliance Audit Report

Ashoka Highways Bhandara Limited

Bhandara, Maharashtra, India

December 5 2016

Quality information

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Executive Summary

Ashoka Concessions Ltd (ACL) is a company involved in development of BOT/Annuity based Highway Projects of Ashoka Group. Under its umbrella, ACL has floated seven special purpose vehicle companies (SPVs) to implement road development projects in India. **Ashoka Highway Bhandara Limited** (hereinafter referred as 'AHBL' or 'Client'), is one of such SPVs, which was formed to develop and widen a stretch of 80.0 km four-lane road asset on NH-6 starting at 405.400 and ending at +km 485.00 in the Gondia and Bhandara district of Maharashtra (hereinafter referred to as 'Project'). The concessionaire agreement was signed by AHBL on 18th September 2007 to manage the road asset for a period of 20 years on BOT basis.

AHBL later appointed Ashoka Buildcon Limited (hereinafter referred as 'ABL') as an EPC contractor for undertaking four-laning of end Durg Bypass to Wainganga Bridge under NHDP-III/ BOT/ IV/ 01 & 02. In this context, NHAI had prepared and submitted the Environmental Impact Assessment Report (EIA) and Resettlement Action Plan (RAP) to ABL.

The project is a joint consortium of Ashoka Buildcon (90%) and India Infrastructure Fund (IDFC Project Equity) (10%) for operating NHAI toll road on BOT basis. Currently, the road asset is operational and is being maintained by AHBL.

The project Equity Group of IDFC requires the project to meet all requirements of the IFC Performance Standards. AHBL has requested AECOM India Private Limited (hereinafter referred as 'AECOM') to provide its technical services for undertaking an Independent Environment, Health, Safety and Social (hereinafter referred as 'EHSS') Compliance Audit for the operating 80 km road stretch.

This Independent Environment, Health, Safety and Social Compliance Audit Report details out the observations made during the assessment along with gaps identified and recommendations to mitigate or minimize the Environment and Social (E&S) risk or impact as identified.

The corrective action plan is presented in Table E1 below:

Table E 1: Corrective Action Plan

Item No.	Corrective Actions	Priority (Low/Med./High)	Responsibility	Estimated cost	Expected Deliverables (Report/Measurement)	Deadline (months)
1.	IFC Performance Standards					
1.1.	Safety monitoring inspections	Medium	HSE Officer-AHBL and Report to Corporate	Budget within existing resources	<ul style="list-style-type: none"> Monitoring inspections needs to be conducted by Patrolling Team and EHS officer deputed at Toll Plaza on monthly basis for inspecting condition of warning signages/ sign boards. ABHL to install sign boards for speed breaker and speed limit near Sendurwafa Toll Plaza, Railway crossing at chainage +km 442.800 and near Nawegaon Wildlife Sanctuary at chainage +km 420.35 to +km 422.340. The sub-contractors engaged should maintain daily safety inspection reports including that of lifting tools and tackles and submit the same to HSE officer, AHBL. Further, AHBL needs to ensure that all non-conformances observed should be resolved within a timeframe of fifteen (15) days 	Fifteen (15) days
1.2.	Grievance reporting and communication	Medium	Project Head , Toll manager and site HRD & HSE Team	Budget within existing resources	<ul style="list-style-type: none"> ABL/AHBL is recommended to update to develop an external grievance reporting and communication system under current Grievance Redressal Mechanism procedure. 	Two (2) month
1.3.	Maintaining records for drinking water quality assessment	High	Project Head Site HRD Team	Budget within existing resources	<ul style="list-style-type: none"> AHBL to ensure that the quality of drinking water supplied to direct and indirect workers meets the IS drinking water quality standards. Water quality testing needs to be carried out at Toll Plaza and Lakhani Camp office to determine fecal contamination. 	One (1) month
1.4.	Periodic monitoring of EHS Performance reporting by engaged subcontractors is	Medium	Project Head Site HRD Team	Budget within existing resources	<ul style="list-style-type: none"> AHBL needs to update sub-contractor's EHS Performance reporting, monitoring and assessment on monthly basis and conduct internal audits at frequent intervals. 	One (1) month

1. Introduction

Ashoka Concessions Ltd (ACL) is a company involved in development of BOT/Annuity based Highway Projects of Ashoka Group. Under its umbrella, ACL has floated seven special purpose vehicle companies (SPVs) to implement road development projects in India. **Ashoka Highway Bhandara Limited** (hereinafter referred as 'AHBL' or 'Client'), is one of such SPVs, which was formed to develop and widen a stretch of 80.0 km four-lane road asset on NH-6 starting at 405.400 and ending at +km 485.00 in the Gondia and Bhandara district of Maharashtra (hereinafter referred to as 'Project'). The concessionaire agreement was signed by AHBL on 18th September 2007 to manage the road asset for a period of 20 years on BOT basis.

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The project Equity Group of IDFC requires the project to meet all requirements of the IFC Performance Standards. AHBL has requested AECOM India Private Limited (hereinafter referred as 'AECOM') to provide its technical services for undertaking an Independent Environment, Health, Safety and Social (hereinafter referred as 'EHSS') Compliance Audit for the operating 80 km road stretch.

The EHSS Compliance Audit was carried out by a team of four (4) EHSS professionals from AECOM from 23rd-26th October, 2016. The key observations with respect to EHSS issues, status of compliance against IFC PS, legal requirements and previously suggested Environment and Social Action Plan (India Infrastructure Fund's (IIF) ESAP) in Environment and Social Review were made during the visit and document review. The health, safety and social factors related to the operation and maintenance of the road that directly and indirectly affect the commuters, maintenance staff and nearby communities were assessed.

This Independent Environment, Health, Safety and Social Compliance Audit Report details out the observations made during the assessment along with gaps identified and recommendations to mitigate or minimize the Environment and Social (E&S) risk or impact as identified.

1.1 Objective of the Study

The main objective of the study is to ensure that the assessment identifies the environment and social risks and impacts of the project. The objectives are as follows:

- Evaluating the adequacy of Environmental and Social Management System (ESMS) developed and evaluating its implementation at Site;
- Assessing compliance with Environmental and Social Action Plan (ESAP) developed for the project and with IFC's Performance Standards;
- Recommendation of mitigation measures to address anticipated risks and closing the areas of concerns identified; and
- Developing Corrective Action Plan, with timelines and responsibilities, to address any gaps or issues that need to be managed throughout the operational life of the project

1.2 Scope of Work

The scope of work for the study entails independent verification of all environmental and social aspects of the project, within the reference framework. This will include the following:

- Review of status of operational E&S permits and status of compliance to permitted conditions along with supporting documents
- Review of the environment, health and safety and social management systems of AHBL and sub-contractors engaged along with the role and influence of regulatory authorities and evaluating its adequacy and status of implementation;
- Review of project operations and associated facilities such as Toll Booth, Control Room, Site office, onsite maintenance units and set-ups etc,
- Review of land procurement process, environmental concerns, stakeholder concerns and other risks;
- Status of environmental clearances and applicable permits, particularly conditions that apply during the operation phase of the project; and
- Consultations with the community in the immediate vicinity and adjacent to the right of way (ROW) of the road as well as any directly impacted land owners during the right of way acquisition.

1.3 Approach and Methodology

The scope of work as provided by the Client and detailed out in the proposal has been the guiding criteria for undertaking this Environment and Social Assessment. The approach and methodology that was adopted for this assessment has been presented below:

Data collection and Desktop Review:

A detailed review and assessment of documents was undertaken in order to attain a comprehensive understanding of the project. At the initial phase of the due diligence exercise, collection of data relating to the different phases of the project such as Environment Impact Assessment (EIA) study undertaken for the road asset by National Highway Authority of India (NHAI), Social Impact Assessment (SIA) Plan, Resettlement Action Plan (RAP), Punchlist and its Compliance Status, Grievances Raised (if any), Permits and Approvals, Monitoring Reports, Environmental and Social Action Plan (ESAP), Environment and Social Policies and Procedures developed and implemented for the project, records maintained etc. from was initiated and reviewed.

Site Assessment:

A site visit was undertaken to assess the status of the RoW, review the implementation of the policies and procedures on site, assess if any encroachment cases have been identified along the RoW, assess the status of compliance to permitted conditions along with review of supporting documents, assess the adequacy of the roles and responsibilities of the personnel handling environmental and social risks and impacts, consultations undertaken with direct and indirect stakeholders of the project, identify gaps in compliance of regulatory and statutory requirements, assess if the road asset is passing through any scheduled areas, critical natural habitat and including evaluating the adequacy of mitigation measures implemented for impacts from air and/or noise in accordance with IFC's Performance Standards and World Bank Group EHS Guidelines.

The assessment included understanding the general operations, identifying potentially unsafe areas, health and safety practices, existing pollution management systems, reporting systems, worker management, emergency response systems, ecology, cultural heritage sites and Indigenous People. It also included interactions direct employees of the project proponent, technical O&M staff, contractors, contractual labour.

Report Preparation:

A detailed Independent Environment, Health, Safety and Social Compliance Audit Report has been prepared describing the project environment and social footprint of the project operations, applicability of the reference framework, site observations and associated non-conformance/ non-compliances and area of concerns and mitigation measures proposed in form of Environment and Social Action Plan which has detailed corrective and preventive actions, mitigation measures along with timelines, deliverables and responsibilities.

1.4 Applicable International Guidelines and Conventions/ Protocols

The Reference Framework for the proposed Independent Environment, Health, Safety and Social Compliance Audit is as follows:

- IFC Performance Standards on Social and Environment, 2006
- Applicable World Bank Group/IFC Environment Health and Safety (EHS) Guidelines, specifically, the following World Bank EHS Guidelines, published on 30th April, 2007
 - IFC EHS General Guidelines;
 - Environmental, Health and Safety Guidelines for Toll Roads; and
 - IFC EHS Guidelines for Toll Roads

1.5 Limitations and Data Gaps

This report describes results of AECOM's Independent Environment, Health, Safety and Social assessment conducted to assess potential EHS and Social issues associated with project related activities. As with any assessment / due diligence study, there is a certain degree of dependence on verbal information provided by facility or site representatives, which is not readily verifiable through visual observations or supported by any available written documentation. During the course of this site assessment, AECOM has attempted to independently assess the potential presence of such conditions within the limits established under the scope of work as described in our proposal. However, verification of potentially important facts is not always possible. AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representative during the assessment process.

This report was prepared by AECOM for the client; AHBL. AECOM's client may disclose information to third parties, who may use and rely upon the information at their discretion. Any use of or reliance upon the information by any party shall be solely at the risk of such third party and without legal recourse against AECOM, its parent, its subsidiaries and affiliates; or their respective employees, Officers, or Directors; regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent, or other negligence and strict liability of AECOM), statute, or otherwise.

The Independent Environment, Health, Safety and Social Assessment is largely based on the documents made available, discussions with stakeholders and observations from site walk through undertaken by AECOM during the assessment process.

Wherever AECOM has been unable to make a judgment or assess any process, it has highlighted the same as an information gap and suggested a way forward. It shall be noted that the land related review could not be completed due to lack of documentation with respect to individual sale deeds; status of compensation paid, and associated details.

1.6 Layout of the Report

The layout of the report is provided as below,

Chapter 2	Project Description
Section 3	Compliance Status with respect to Fund's ESAP
Section 4	Compliance Status with respect to IFC PS
Section 5	Corrective Action Plan

Annexures have also been added to the Report to support the observations made in preparation of the report.

Appendix A.1: Strip Plan for the Project

Appendix A.2: List of documents reviewed

Appendix A.3: Photo Documentation

2. Project Description

This section of the report provides the details about the project background and current status of the operating road asset. It also provides a description of project components along with associated facilities.

2.1 Project Background

AHBL was appointed as Concessionaire by National Highways Authority of India (NHAI) on 18th September, 2007 for a period of 20 years including 2.5 years construction timeframe for implementation of design, construction, development, finance, operation and maintenance of the operating road asset Chattisgarh / Maharashtra Border to Wainganga Bridge on Build Operate Transfer (BOT) basis. The project became operational on 16th March, 2008.

The project starts from Chainage +405.00 at Bag Nadi in the district of Rajnandgaon and ends at Chainage +485.000 at Gadegaon village in Bhandara district traversing a total length of 80 km as given below in **Figure 2-1**.

The road passes through urban and semi urban areas on National Highway No.6 (NH-6) originating from Kolkata which further traverses through the states of West Bengal, Jharkhand, Orissa, Chattisgarh, Maharashtra and Gujarat and terminates at Hazira in Gujarat. The geo-coordinates of the project alignment are given in **Figure 2-2**.

Figure 2-1: Location Map

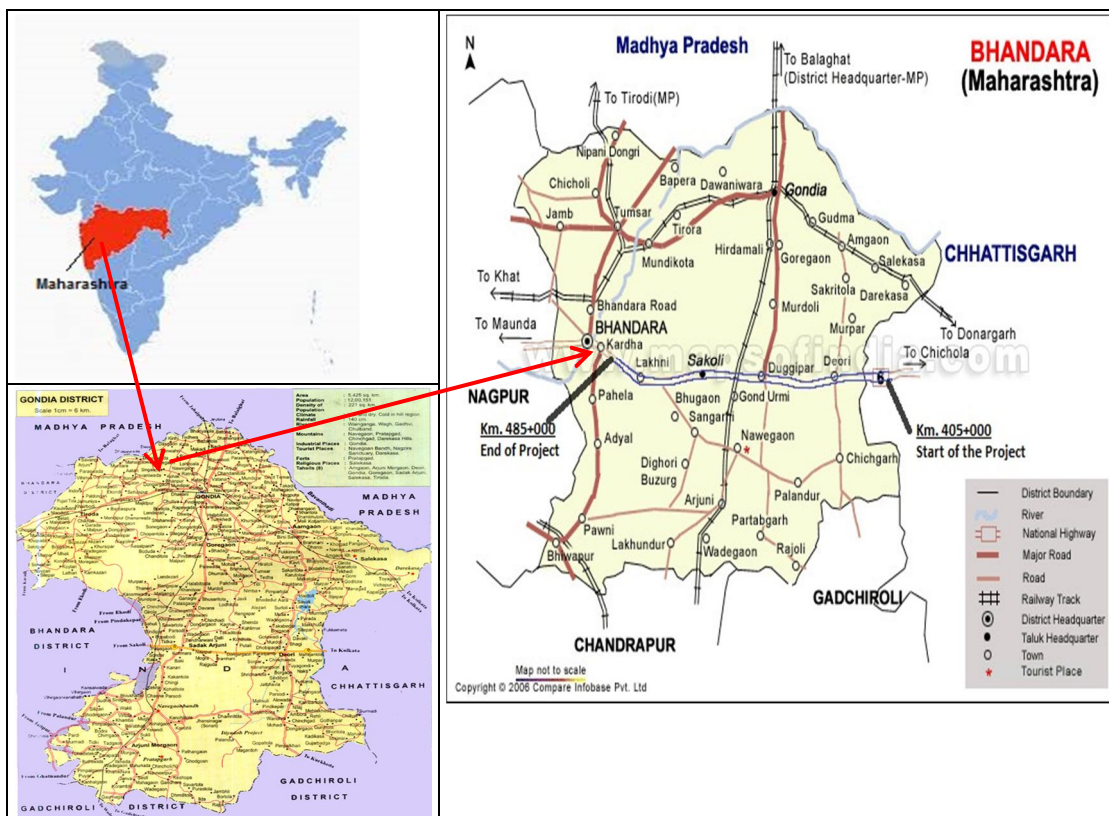


Table 2-1: Geo-coordinates of the project alignment

Milestone	Location	Chainage	Geo-coordinates
AHBL Project Starting point	Bag Nadi	405.00	21° 4'21.05"N 80°27'3.43"E
AHBL Project End point	Gadegaon	485.00	021° 04'58.60"N 079° 47'8.55"E

Source: AECOM site visit

The details of the areas falling under the operational road asset are given below in **Table 2-1**. The operational road asset of AHBL passes through a total of thirty (30) villages in Bhandara and Gondia district in Maharashtra.

Table 2-2: Details of areas under the operational road asset

S.No.	District	Taluk	Name of the Village
1	Gondia	Sadak- Arjuni	Soundad
2			Futula
3			Sawangi
4			Bamhani
5			Kohamara
6			Nainpur
7			Doepayali
8			Bamhani/Khadki
9			Dongargaon
10			Khurshipar
11	Bhandara	Deori	Maramjob
12			Deori
13			Shirpur
14			Dighori
15	Bhandara	Lakhani	Singhori
16	Bhandara	Bhandara	Kaknagadh
17			Kanhalmoh
18	Bhandara	Lakhani	Dhargaon
19	Bhandara	Sakoli	Makardhokada
20		Sakoli	Ukara
21		Sakoli	Wirshi
22	Bhandara	Lakhani	Sendurwafa
23			Sakholi
24			Jambhadi
25			Mundipar

26		Pimpalgaon
27		Manegaon
28		Lakhani
29		Murmadi
30	Bhandara	Gadegaon

It was noted during the review of Resettlement Action Plan (RAP) that the total land acquired for the project and associated facilities is 52.18 ha. The compensation details for land acquisition are given in **Table 2-3**.

Table 2-3: Compensation details for land acquisition

Aspect	Details
Total Land acquired (ha)	52.18
Number of land owners	1579
Total compensation paid (Rs)	247233545
Average rate per sqm	473.80

The project was awarded Environmental Clearance by Ministry of Environment and Forests vide letter no. 5-18/2007-IA-III dated 11th June, 2007.

2.2 Current Status of the Project

The project is currently operational. The present road configuration is a seven (7) m carriageway with available ROW varying from 33.5 m to 67.0 m and a total length of 80.0 km. The details of the road stretch are given below in **Table 2-4**.

Table 2-4: Details of road stretch of AHBL

Component	Details
Service Road (km)	28.4
Major Intersections (no.)	5
Major Intersections (no.)	29
Major Bridges (no.)	4
Minor Bridges (no.)	13
Vehicular underpasses (no.)	12
Cattle underpasses (no.)	6
Railway crossing (no.)	1
Bus bays (no.)	15
Culverts (no.)	113

The EPC Contract was awarded to M/s. Ashoka Buildcon Limited (ABL) and presently O&M is entirely undertaken by M/s. ATR Infraprojects Pvt. Ltd, a subsidiary of ABL.

M/s. Consulting Engineers Group (CEG) was appointed as an Independent Consultant for the project for monitoring and supervision of the quality and environment related aspects during construction, operation and maintenance period.

Manpower

It is reported that AHBL has 104 direct employees. ATR Infraprojects Pvt. Ltd. (ATR), one of the subsidiaries of Ashoka group has signed a contract with ABL for supplying the skilled manpower and labour to undertake work

related to maintenance of road such as Painting, Repairing and Cleaning of road; Watering of plants, Grass cutting and Stone fixing, etc. About 73 workers have been engaged on through M/S ATR

Sendurwafa Toll Plaza (+km 449.260)

- The Toll Plaza having 12 lanes (5 Lane + 1 Lane for over size dimension vehicle) along with administrative office for O&M facilities like Fencing, Lined drain and parking area etc. is being operated by AHBL. The Toll booth operation is carried out in three shifts per day. The Toll Booth Operation team comprises Administrative officer, Assistant Accountant, Shift-In charge, Toll Manager, Toll Supervisor, Asst. Toll Supervisor, Toll Collector, Toll Attendant, Barrier Man, Gun man.
- As observed, one (1) 40 kVA DG set has been installed at Toll Plaza for power backup.
- There is one (1) borewell which is used for meeting water requirements of the site including plantation, drinking and domestic water requirements. For drinking water, the water is treated using Reverse Osmosis (RO system).
- **Emergency Preparedness:** It was observed:
 - It was observed that an Emergency Response Preparedness Plan (EPRP) is under implementation. The Personal Protective Equipment (PPE) inventory and Issue Register is maintained at Toll Plaza.
 - The EHS Policy, contact numbers of Emergency Response Team (ERP) and Emergency Evacuation Plan are displayed at the Main Gate of Toll Plaza.
 - The signages pertaining to emergency exit, Assembly Point were observed at the Plaza.
 - Fire extinguishers, comprising of CO₂-type and Dry Chemical type (DCP) and first aid box were observed at Toll Plaza.
 - Two (2) patrolling vehicles of AHBL were operational round the clock; one (1) ambulance equipped with Cardio Pulmonary Resuscitation (CPR) and Oxygen Cylinder are available

Lakhani Camp Office

The Camp Office is being used for O&M activity for the entire stretch of AHBL. The display of EHS Policy, implementation of EPRP, first aid box (1) and fire extinguishers were observed at Lakhani Camp Office.

2.2.1 Punch List Items

As per the Provisional Completion Certificate issued on 19th August 2010, a punch list item was suggested to AHBL for completion of activities within four (04) months of substantial completion. As reported by the AHBL site representative and reported through observations during the site assessment, the items mentioned in the Punch List have been closed and there are no pending items left unachieved. The compliance status w.r.t. punch list items have been provided below in **Table 2-5**.

Table 2-5: Details of Compliance status of Punch List Items

S.No.	Description	Activity Schedule	Status of work
1.	Plantation of avenue trees along the RoW and other landscaping work within RoW	Median Plantation = 3147 Nos. Avenue plantation =10200	Completed
2.	Completion of work on provision of unlined roadside drains	12.0 km	Completed
3.	Lining of roadside drain	19.83 km	Completed
4.	Construction of rest areas bus bays	2 Nos. 8 Nos.	Completed
5.	Completion of fencing work of RoW	Boundary -1234 Nos. 200 m stone = 64 Nos 1.0 km stone = 52 Nos.	Completed
6.	Turfing of fencing work of RoW	20 km	Completed

7.	Stone masonry works/stone pitching	7.56 km	Completed
De-Linked Items			
1.	Forest area km 420.350 to km 422.340 = length 1.99 km	Embankment, sub grade, Kerb casting, median filing, shoulder filing, unlined drain, avenue plantation, median plantation, road marking, marker stone, pipe culvert and safety signage's.	AHBL has not obtained Forest Clearance in this road stretch therefore no road construction activity has been carried out in this road alignment
2.	Forest area between km 431.820 to km 434.694 = length 2.87 km	Embankment, sub grade, Kerb casting, median filing, shoulder filing, unlined drain, avenue plantation, median plantation, road marking, marker stone, pipe culvert and safety signage's.	
3.	Forest area between km 458.170 to km 461.250 = length 3.0.8 km	Embankment, sub grade, Kerb casting, median filing, shoulder filing, unlined drain, avenue plantation, median plantation, road marking, marker stone, pipe culvert and safety signage's.	
4.	Railway Over Bridge (ROB) at km 442+800	GAD not yet approved by Railways	Not in original scope. Change of scope approval and granted by NHAI vide their letter No. NHAI/BOT/110 19/15/22003 dated 08/10/2008.

2.3 Permits and Approvals

The Permits and Licenses obtained for this project in the Operations and Maintenance Phase have been provided below:

S.No.	Licence/Permits	Approval
1	Environmental Clearance	Environmental Clearance was obtained from MoEF vide letter no. 5-18/2007-IA.III dated
2	Contract Labour (Regulation and Abolition) Act, 1970	Asoka Buildcon has obtained Contract Labour License, vide letter No. ALCN /46(L)/66/2013-CL dated 9th May 2016 under Contract Labour (Regulation and Abolition) Act, 1970 and Central Rules, 1971 for workers.
3	Licence to Work a Factory (Factories Rules 1962)	Licence to work a factory was Granted to M/s. ATR InfraProjects dated 09th February 2013
4	Load Sanction Certificate for Sendurwafa Toll Booth	55 kW Load Sanction Certificate for Sendurwafa Toll Booth from MSEDCL vide order no. EE/SKL/LS/02 dated w1st April, 2010
5	Land Use Certificate	Change of Land Use (CLU) Certificate was obtained at Lakhani Camp vide letter dated 15th November, 2006
6	Consent to Operate (CTO) for Crushing unit	The CTO for Crushing Unit was obtained from MPCB vide letter no. .MPCB/14/5589 dated 11th June 2014
7	Tree cutting permission	Tree cutting permission obtained from Forest Regional

Office, Bhandara vide letter dated 18th November 2006

8	Completion Certificate	Provisional Completion Certificate obtained vide letter No. ZL-AP/NH-6/IC/03/2010-11/501 dated 19th August 2010
9	Crane fitness test certificate	Crane Fitness Certificate was obtained from Chief Inspector of Factories, Govt of C.G. Nagpur valid upto 7th January 2017

3. Compliance to Fund’s Environment and Social Action Plan (ESAP)

The status of compliance against Fund’s Environment and Social Action Plan (ESAP) is given below in **Table 3-1**

Table 3-1: Compliance to Fund’s Environment and Social Action Plan (ESAP)

Item	Deliverable	Completion Date	Compliance Status
1	AHBL shall commit to the Fund to establish, implement and maintain Environment & Social Management Systems and Procedures for managing environment, health, safety and social performance in accordance with the elements of ISO 14001 & OHSAS 18001 for AHBL within one year of operationalisation. In the interim, ABL shall manage EHSS impacts as per its ISO 14001 certified environmental management system.	Before signing.	Complied
2	AHBL shall incorporate ILO objectives in its HR policy and procedures.	Before signing and not later than March 2009	Complied
3	AHBL shall submit copy of forest clearance / approval once obtained and address concerns, if any, to the satisfaction of the Fund	Within a week from the date of obtaining the same	Complied
4	<p>AHBL shall undertake a supplementary study to evaluate</p> <ul style="list-style-type: none"> - environmental impact assessment both for construction and operation phases, in accordance with the Funds PS 1, PS3, PS4 and PS6 requirements & General EHS Guidelines dated April 30, 2007 issued by IFC and based on the outcome of the supplementary impact assessment, develop and implement mitigation plans for identified impacts during both construction and operation phases, which are consistent with the Fund PS 1, 3, 4 and 6 requirements - align RAP and entitlement framework to include non-titleholders getting affected as per the TOR specified and draw plans to address and mitigate livelihood issues emerging from such displacement so that the same is consistent with PS 5 requirement. 	<p>Engagement of consultant before disbursement</p> <p>Completion of Study/Development of mitigation plans – within six (6) months from the first disbursement</p>	Complied
5	AHBL shall explain the computation of replacement value for different assets including land and ensure that the same shall comply with the PS 5 requirements	Before disbursement	Complied
6	AHBL shall develop community engagement plan on health and safety	Within six (6) months of signing	Complied

4. Compliance Status with respect to IFC PS

This section details the compliance of the project with respect to requirements under IFC Sustainability Framework and applicable national and local regulations. The observations made during the Site visit, details of observations, gaps and recommendations identified are discussed in the below sections.

4.1 Performance Standard (PS) 1: Assessment and Management of Social & Environmental Risks and Impacts

4.1.1 Environment and Social Management System

Requirement -1: *The client, will conduct environmental and social assessment of the project, and establish and maintain an ESMS appropriate to the nature and scale of the project and take measures for mitigation of the identified environmental and social risks and impacts. The ESMS will incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review.*

Observation 1:

- Ashoka Concessions Limited (ACL), the parent company of AHBL, is an ISO Certified organization. ACL has developed an Integrated Management System (IMS) Manual (ACL/IMS L-1) covering ISO 9001:2015 (QMS), ISO 14001:2015 (EMS) and OHSAS 18001:2007 (OHSAS) requirements, which is applicable to all its subsidiaries including SPVs such as AHBL, and all engaged sub-contractors for implementation at project site. AHBL has documented procedures for management of various EHS&S issues along with responsibilities, monitoring plan, review and audit mechanism as given below:
 - Health, Safety and Environmental (HSE) procedure manual (DOC/ ABL/ HSE / DPM) dated Date 30th July 2016
 - Standard Operating Procedure (SOP) for ESMP- (ACL/HSE&S/ESMP-SOP/01 dated 16th January, 2013
 - Environmental and Social Management Plan (ACL-ESMP/L-2), (Version 02 dated 2nd February, 2015)
 - Guidelines for Traffic Management Plan (ACL/HSE&S/ESMP/ GTMP/01)
 - PPE Matrix for Road and Bridge construction workers (ACL/HSE&S/ESMP/PPE Matrix/01)
 - HSE Work Instruction (ACL /IMS/HSE/01)
 - Emergency Response Plan (ACL/HSE&S/ERP/01)
 - Tree Plantation Guideline for National Highway Projects (ACL/HSE&S/ESMP-TPGNHP/01)
 - Guideline for Grievance Redressal Mechanism for SPV/EPC (ACL/HSE&S/ESMP-GGRM/01)
 - Guideline for Disposal of Construction Waste (ACL/HSE&S/ESMP/GDCW/01)
 - Environment Monitoring Plan (ACL/HSE&S/ESMP/GEMP/01)
 - Guideline for Tool Box (ACL/HSE&S/TOOL BOX TALK/01)
- ABL's Health, Safety and Environmental procedure manual (DOC/ ABL/ HSE / DPM dated Date 30th July 2016) comprises of QHSE Policy, Risk and Hazard Assessment, Legal Register, Accident Reporting Procedure, and Work Permit System. The Standard Operating Procedure for ESMP- (ACL/HSE&S/ESMP-SOP/01 dated 16th January, 2013 addresses the impacts from pre-construction, construction and operation phase and ensures effective management of the potential impacts through implementation of mitigation measures along with detailed roles and responsibilities for implementation. The ESMP (ACL/ESSMSM L-2) (Version 02 dated 2nd February, 2015) comprises of Quality, Environment, Health, Safety objectives; Environmental Monitoring Plan along with frequency of monitoring environmental parameters and an Environmental Management Plan (EMP) along with targets, roles and responsibilities for effective implementation.

- AHBL monitors the implementation of the Environmental and Social Compliance based on the Environmental and Social Action Plan (ESAP) for monitoring adherence of the organization to the IFC Guidelines.

Gaps:

- None

Recommendations:

- None

4.1.2 Policy

Requirement -2: *The client will establish an overarching Environmental and Social policy defining the environmental and social objectives to achieve sound environmental and social performance. It should include a framework for the environmental and social assessment and management process, and should be in consistent with the applicable laws and legislations at State and National level and the principles of the Performance Standards.*

Observation 2:

- The Environment, Health, and Safety Policy of ABL signed by Chairman dated 1st August, 2013 in English language was observed to be displayed at Sendurwafa Toll Plaza and Lakhani Camp office. It comprises of commitment to continual improvement of quality, environmental, occupational health and safety management system performance; prevention of pollution, injury and ill health; compliance with all applicable legal norms; and consultation with all concerned stakeholders. The display of EHS policy in local language (Hindi) was not observed in the Toll Plaza/Lakhani Camp office premises. Further, the Social Policy was not available for review.

Gaps:

- None

Recommendations:

- None

4.1.3 Identification of Risks and Impacts

Requirement -3: *The client will establish and maintain a process for identifying the environmental and social risks and impacts of the project. The scope of the risks and impacts identification process will be consistent with good international industry practice, and will determine the appropriate and relevant methods and assessment tools. The process may comprise a full-scale environmental and social impact assessment, a limited or focused environmental and social assessment, or straightforward application of environmental siting, pollution standards, design criteria, or construction standards. The risks and impacts identification process will consider the emissions of greenhouse gases, the relevant risks associated with a changing climate and the adaptation opportunities, and potential transboundary effects, such as pollution of air, or use or pollution of international waterways.*

Observation 3:

- The Environmental Impact Assessment (EIA) study conducted for the project identified the environmental and social risks for the project during operation phase and the mitigation measures proposed to ameliorate such impacts.
- The risks identified include impacts on noise levels and impacts on air quality and hazardous waste generation due to DG Set operations at Toll Plaza and Lakhani Camp.

- ABL has obtained certificate of verification from International Standards Certifications (ISC) under ISO 14064.1:2006- Greenhouse Gases Part I and Part II in 2013 for compliance with the standards of verification.

AHBL's Hazard Identification and Risk Estimation Control Procedure (HIRA), maintained as a part of Risk Register for identification and control of potential hazards associated with the work activities was reviewed during the document review. It includes risk estimation for fire/explosion, fall hazard, accidents due to traffic movement, road accidents, snake bites, electrical shock, slip/trip due to poor illumination, civil unrest, handling hazardous chemicals, dust inhalation and elevator failure.

Gaps:

- None

Recommendations:

- ThNone

4.1.4 Management Programs

Requirement -4: *The client will establish management programs that, in sum, will describe mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project.*

Observation 4: AHBL has established an Environmental and Social Management and Monitoring Plan to establish and maintain an integrated environment and social management programs. It covers significant environmental and social risk and impacts on employees, contractors and community health and safety.

The Management Plan comprises of implementation guidelines, targets, and responsibility for implementation of the following environmental, health, safety and social measures:

- Pollution Management Plan
- Community Health and Safety Management Plan
- Biodiversity Conservation Plan

The environmental monitoring plan framework includes the following components:

- Ambient Air Quality Monitoring
- Ambient Noise Monitoring
- Water Quality Monitoring
- Tree Plantation Monitoring

The monitoring program is based on the Environmental and Social Management and Monitoring Plan (ESMMP) for the Project, covering construction, and operation phases of the Project. The Air Quality and Noise level monitoring is being conducted on quarterly basis.

Maintenance Management: The procedure includes routine maintenance, periodic maintenance, work instructions for road maintenance, emergency maintenance and other maintenance which includes illumination, highway signs and road markings, landscaping, safety barriers and pedestrian guard rail. The Road maintenance inventory for metal beam anti crash barrier, Routine Maintenance Plan, Monthly Inspection Report-Road signages, Periodic Maintenance Plan, Pedestrian Railing, Junctions and Median openings for October, 2016 were provided for review and noted to be followed on site.

Road Asset Management: The procedure on Road Asset Management is in place which ensures maximum availability and efficient utilisation of the road asset. It also includes the protection of the ROW encroachments and other unauthorized activities. Managing of rest areas, bus bays, bus parking areas and other facilities for highway users including the buildings and plaza facilities are the responsibility of the AHBL. AHBL is to list the encroachments with a description, location and extent of each encroachment, draw up a method statement and programme for the removal of the accesses or encroachment by NHAI.

Traffic Management: The procedure on Traffic Management detailing the traffic management plan has also been provided. The Project corridor is to be monitored by 24 hours by patrolling team who has been given the responsibility of inspecting elements relating to new encroachments within the ROW, unauthorized construction

of road or entrance connections, unauthorized structures and interference with drainage systems within the ROW. An ambulance service with a medical attendant and equipped with stretcher, first aid box, Cardio Pulmonary Resuscitation (CPR) and Oxygen Cylinder is required to be deployed and kept at the site office premises to attend to any emergencies arising out of road accidents.

During the site assessment, the ambulance was observed to be parked at the designated Toll Plaza Office.

Gaps:

- None

Recommendations:

- None

4.1.5 Organizational Capacity and Competency

Requirement -5: *The client, in collaboration with appropriate and relevant third parties, will establish, maintain, and strengthen as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. The key environmental and social responsibilities should be well defined and communicated to the relevant personnel and to the rest of the client's organization. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous environmental and social performance.*

Observation 5: As per the organizational structure of AHBL, ABHL shall directly recruit a Toll Operations Manager who will be responsible for coordination, discussion and liaison with NHAI. The Toll Operations Manager shall be responsible for overall maintenance of the project by directly monitoring and guiding the maintenance works being planned. The Plaza Manager reports to HO Project Coordinator who further reports to Toll Operation Department Head. The Accounts Officer (1), H.R. Officer (1), Assistant Incident Management (ICMG) In-charge (1), Shift In-charge (4), IT Engineer (1), Electrician (3), HSE Officer (1), Store Assistant (1) and Auditor (1) reports to the Assistant Plaza Manager. The General Manager-Maintenance is further assisted by HR Supervisor, Site Supervisor, HR Officer, Officer-Stores, Supervisor-P&M, and Lab Assistant.

The Incident Controller is ICMG In-charge who further reports to Team leader. The Incident Controller is responsible for supervising Emergency Response Team which comprises of Rescue Team officers (10), Fire Fighting team (9), First Aid team (9), Electrical Co-ordinator (4) and Patrolling team (4) members.

The HSE Officer is responsible for imparting safety training as per Safety calendar prepared in coordination with Corporate HSE Team, preparing EHS MIS Reports comprising details of training, drills, Incident Reports, Accident Reporting, Legal Matrix, Monthly HSE Minutes of Meeting, Memorandum issued for violation of safety norms, Tool Box Talks and Risk Assessment. The attendance records of trainings, Tool Box Talks and EHS Committee meeting was available for review. The HSE Officer is also responsible for issuing Memorandum in case of violation of Safety measures, Incident Reporting and implementation of Environmental and Social Management Plan measures as identified in ESAP.

The HR officer is responsible for conducting community consultations, undertaking Corporate Social Responsibility (CSR) initiatives and addressing Grievance related issues for the employees and the communities residing in the adjoining areas

Gaps:

- None

Recommendations:

- None

4.1.6 Emergency Preparedness and Response

Requirement -6: *The ESMS will establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment. This preparation will include the identification of*

areas where accidents and emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially Affected Communities and periodic training to ensure effective response. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.

Observation 6:

- The Emergency Response Plan (ERP) prepared comprises of a Response Management Team with delegated roles and responsibilities of Fire Fighting team, Rescue team and First Aid Team. It covers accidents due to heavy machinery, fire and explosion due to fuelling station and Store, Chemical Spill, Road Accidents, Robbery and natural hazards like earthquake, landslides and flood etc. The Reporting and alerting procedures and equipment to be handled in emergency situations have been detailed out in ERP.
- It was observed that there is a well-defined Incident Management Team at site comprising of ten (10) member Rescue team, nine (9) member Fire-fighting team, nine (9) member First Aid team, four (4) member Control Room team and four (4) patrolling staff team. Further, one (1) HSE officer and twenty one (21) security guards including four (4) gunmen at Site on payroll of AHBL
- It was observed that the Patrolling team comprising of four (4) personnel are responsible for patrolling round the clock and preparation of Patrolling Vehicle Inspection Report on daily basis. The Control Room office receives call in case of emergency and conveys the information to Paramedical staff that further informs police and sends Ambulance to the location of the accident.
- It was observed that display of Emergency contact numbers have been displayed at multiple locations along the road alignment however an emergency telephone was not observed along the entire road stretch which is non-conformance with National Road Safety Policy.
- A high mast was observed only at Toll Plaza. Reportedly, AHBL has not provided illumination arrangement as it not a part of Concessionaire Agreement signed with NHAI. However, as per Code of Practice for lighting of Public thoroughfare (IS:1944 Part-V and VI, 1981) illumination needs to be towns, city centers and areas of civic importance; however it was observed that there is no provision for illumination along the entire road stretch
- The records for Accident/Incident Investigation, trainings, Fire Fighting team, First Aid Team, First Aid training Attendance sheet are available. The Accident Investigation Register comprising of details of accident, location (chainage), recording fatal, grievous, minor and non-injured cases, and safety measures provided for addressing the Accident Investigations.
- The Personal Protection Equipment (PPE) Inventory is maintained which comprises of records for Safety Belt, Helmets, Reflective Jackets, Safety Shoes, and Gloves. Further, it was informed that ABL/AHBL monitors usage of PPE by all contractors engaged at Site as per PPE Management Procedures

Gaps:

- None

Recommendations:

- None

4.1.7 Monitoring and Review

Requirement -7: *The client will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements. Where the government or other third party has responsibility for managing specific risks and impacts and associated mitigation measures, the client will collaborate in establishing and monitoring such mitigation measures. Where appropriate, clients will consider involving representatives from Affected Communities to participate in monitoring activities.*

Observation 7:

The Environmental, Social and Safety Management Plan (ESMMP) prepared by the Company provides a framework for environmental and social management of the project and operation phase along with dedicated roles and responsibilities and frequency of monitoring.

The EHS Committee comprising of representatives from ACL is responsible for ensuring environmental and social effectiveness at Site through EHS Audit System, Monthly Environmental Progress Reporting for ensuring environmental compliance w.r.t. ESAP and ESSMP. The EHS Committee Meeting proceedings are maintained to implement Corrective Action Plan identified based on findings and a target date for implementation of the measures. The findings remaining unaddressed are discussed in the next EHS Committee Meeting for closure of the identified issues. There is a mechanism for Internal EHS audit to be conducted by ACL's EHS committee and submission to the management for approval and supervision. The Internal Audit Summary Report was available for review which comprises of findings related to conformances and non-conformances and action plan for closure of identified issues within a fortnight. The Internal Audit team includes Toll Administration and Incident Management Team, HR & Admin Team, Information Technology (IT) team at Toll Plaza and Store, Plant and Machinery team at Lakhani Camp office.

The ambient air quality monitoring for evaluation of PM2.5, PM10, SO2 and NOX levels at Lakhani Camp and Sendurwafa Toll Plaza and noise monitoring is carried out on quarterly basis by a NABL accredited laboratory.

The Health, Safety and Environment Code of Conduct for Contractors of Ashoka Concessions Limited dated 8th August, 2014 is being adhered by AHBL for providing General Safety Guidelines for Contractors, adherence of EHS norms by engaged contractors and for providing Safety Code of Conduct to Contractors, guidelines on PPE adherence, and Transport and Road Safety, Road Diversion Safety Management.

Gaps:

- Although the EHS Performance reporting, monitoring and assessment record keeping for the engaged subcontractors is undertaken, there is no periodic updation of these records.

Recommendations:

- AHBL needs to update sub-contractor's EHS Performance reporting, monitoring and assessment on monthly basis and conduct internal audits at frequent intervals.

4.1.8 Stakeholder Engagement

Requirement -8: *The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.*

When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

Observation 8:

The Community Development initiatives are undertaken by engagement of HR Officer at Toll Plaza and interaction with the locals. The Toll Plaza Manager is responsible for undertaking Community Development Plan (CDP) measures which includes construction of a Water tank to be used by the community.

The community related grievances are maintained in the Grievance Register and the issues related to community health and safety issues are being addressed. The records for year 2016 were available for review and noted to be in order.

Gaps:

- None

Recommendations:

- None

4.1.9 External Communications and Grievance Mechanism

Requirement -9: *External Communication: Clients will implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.*

Grievance Mechanism for Affected Communities: Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.

Observation 9:

It was noted that AHBL has established Grievances Redressal Mechanism (GRM) Guideline and Procedure which is communicated to project affected persons/community. The document specifies objective, scope, process, and duration of grievance handling, frequency of grievance meeting for registering grievance, role of HR, Grievance Committee and Redressal Mechanism.

Gaps:

- None

Recommendations:

- None

4.1.10 Ongoing Reporting to Affected Communities

Requirement -10: *The client will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.*

Observation 10:

- AHBL maintains an informal compliant register for external communities. The grievance records and minutes of meeting are documented with corrective measures.
- It was observed that AHBL has procedure where the affected community person shall first raise his/her grievance to his/her reporting SPV/EPC then it forwarded to NHAI/PWD/SDM.

Gaps:

- None

Recommendations:

- None

4.2 Performance Standard (PS) 2: Labour and Working Conditions

4.2.1 Human Resources Management Policy and Policies

Requirement-11: *Performance Standard 2 asserts that the client will adopt and implement Human Resource Policies and Procedures appropriate to the nature of the workers and the business activities in which client is involved. The policy and procedures covers aspect like non-discrimination and equal opportunity on the grounds of personal characteristics, retrenchment, working relationships, child labour, forced labour and retrenchment.*

Observation 11:

- ABL has developed HR Policy and HR procedure Manual (Doc No /ACL/HRD/DPM) which define general procedures and instruction for the direct employees of ABL. The Policy is extended to all SPV's including AHBL. HR Policy covers aspects like recruitment, job responsibility, leave policy, leave encashment, policy for Third party workers; Payment of advance; Attendance; Induction; Reimbursement; Med-claim; Retirement process'; Prevention of Sexual harassment at work force policy; Child labour employment; Promotion; Performance appraisal system; Grievance handling procedures; Provident fund, bonus; Gratuity and Service award etc.
- AHBL has a dedicated HR manager at corporate level who is responsible for overseeing compliance with human resources and labour related regulatory requirements. Reportedly all employees were informed of their working hours, salaries, leaves and other benefits at the time of employment through induction program. All employees have been covered under general insurance & EPF (Employees Provident Fund) schemes.
- The appointment letter of employee includes term of employment, leave provision, duty timing, duties, allowances, Grades and corresponding designation/position, obligation and termination/ separation clauses. A sample copy of appointment letter of site staff was verified at the time of site visit. Terms of employment include wages and benefits, group medical insurance and leave for illness or holiday have been specified in procedure for Human Resource manual.
- AHBL has entitled all its employees with house rent allowance, conveyance allowances, medical allowances, system allowance, leave travel allowance and special allowance. Leave card is allotted to all employees.
- Reportedly any grievance raised by employee at site is reported to HR manager, who tries to resolve it at site only. However, in case required, the matter is escalated to the corporate office. Grievances raised by employee are handled as per procedure set under GRM and is recorded. The site grievance redressal committee meets on monthly basis to discuss any grievances reported, the minutes of which were verified.

Gaps

- None.

Recommendations

- None

4.2.2 Working Condition and Term of Employment

Requirement 12: *As per Performance Standard 2, the project is required to provide reasonable working conditions and terms of employment to its staff and where accommodation services are provided to the workers, project is required to put in place and implement policies on the quality and management of the accommodation and provision of basic services*

Observation 12:

The following procedural observations have been noted with respect to working conditions and terms of employment:

- At present, a total of 183 O&M employees are engaged at the project site. At the AHBL toll plaza, around 103 employees have been engaged, while at camp office about six (06) employees have been posted. About 74 employees have been engaged for maintenance works. The work undertaken by these employees include operation and maintenance of toll plaza and road such as civil engineer, site supervisor, operators, technician drivers, patrolling supervisor, electricians, security guards, helpers, etc
- Appointment letter of AHBL include term of employment, leave provision, duty timing, duties, allowances, Grades and corresponding designation/position and obligation. A sample copy of appointment letter of site staff was verified at the time of site visit.
- Terms of employment include wages and benefits, group medical insurance and leave for illness or holiday have been specified in procedure for Human Resource manual.
- AHBL has entitled all its employees with house rent allowance, conveyance allowances, medical allowances, system allowance, leave travel allowance and special allowance. Leave card is allotted to all employees. The maximum 18 sick leaves have been accumulated to employees. Casual leave of 2 days maximum can be taken at a time.
- AHBL has a tie-up with Reliance Insurance Company, under which the employees are provided with group medical cover of 40 lakh and group accidental cover of INR 4 lakh.
- The attendance registers of the employees of AHBL were verified during the site assessment and found to be regularly maintained.
- Muster rolls register with details on age and gender of all employees are maintained at the on toll plaza and camp office.
- At the entrance of the Toll plaza and camp office, details on date of distribution of wages, rate of minimum wages, Labour Commissioner and Labour Enforcement Officer have been provided.

Gaps

- None.

Recommendations

- None

4.2.3 Working's Organization

Requirement 13: *In countries where national law recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively, the client will comply with national law. Where national law substantially restricts workers' organizations, the client will not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The client should not seek to influence or control these mechanisms.*

Observation 13:

As reported by the site management of AHBL, no employees engaged by them are member(s) of any association or union. However, as informed by the Company representatives, the Company does not restrict or discourage the formation and registration of association or union.

Gaps

- None

Recommendations

- None

4.2.4 Non-Discrimination and Equal Opportunity

Requirement 14: *As per Performance Standard 2, client shall not make employment decisions based on personal characteristics unrelated to inherent job requirements. The client is required to base the employment relationship on the principle of equal opportunity and fair treatment, and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices. The client is to take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women.*

Observation 14:

- As understood during discussions with company representative, ABL is an equal opportunity employer and does not discriminate in hiring on the basis of religion, region, or gender. Reportedly, no incidents of discrimination were reported at Toll plaza and Camp office by management representative as well as employees interviewed during the time of the site assessment.
- However, the HR procedure does not cover any clause or statement pertaining to non-discrimination and equal opportunity among workforce.

Gaps

- None

Recommendations

- None

4.2.5 Grievance Mechanism

Requirement 16: *As per Performance Standard 2, the project is required to provide a grievance mechanism for workers to raise workplace concerns. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed.*

Observation 16:

AHBL has developed Grievances Mechanism Redressal (GMR) Guideline and Procedure which is applicable to all permanent, sub-contractor employees, Project affected persons/community and road users. The document specifies objective, scope, process, and duration of grievance handling, frequency of grievance meeting for registering grievance, role of HR, Grievance Committee and Redressal Mechanism.

- Resolving Grievance for AHBL/sub-contractor employee: As per the procedure, the employee shall first raise his/her grievance to his/her reporting site HR/Administrative then forwarded to corporate HR/Administrative.
- Resolving Grievance for Project Affected Person/Community: As per the procedure, the affected person shall first raise his/her grievance to his/her reporting SPV/EPC then it forwarded to NHAI/PWD/SDM.
- Resolving Grievance for Road Users: As per the procedure, the road users shall first raise his/her grievance to his/her reporting SPV/toll plaza manager and then it forwarded to corporate toll plaza manager and administration.

AHBL has a grievance redressal report and filled form is maintained on site was available for review. It covers details such as name of employee, location, grievance identified date, nature of grievance, preliminary action taken, present status and grievance resolve/pending signature of the HR/Administrative/SPV/ Toll plaza.

Gaps

- None

Recommendations:

- None

4.2.6 Child and Forced Labour

Requirement 17: *The client will not employ children in any manner that is economically exploitative, or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development. Children under the age of 18 will not be employed in hazardous work. All work of persons under the age of 18 will be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work.*

The client will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. The client will not employ trafficked persons.

Observation 17:

- During discussion held with AHBL site management, it was noted that the employees (permanent and contract) during the engagement process have to submit their identity proofs and address proofs for record purposes. During this stage, the date of birth is verified by the recruitment team. In addition, the employees (permanent) are issued an appointment letter with terms of contract, notice period, number of leaves and other details mentioned.
- As per ABL's HR Policy, the company is committed to International Labour Organization (ILO) core objectives in addressing labour working conditions and prohibits employment of child labour across its activities and by its contractors"

Gaps:

- None

Recommendations:

- None

4.2.7 Occupational Health and Safety

Requirement 18: *The client will provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women.*

Observation 18:

- It was observed that Ashoka Buildcon Limited has an Online Accident and Reporting Analysis Software which is being implemented at AHBL for recording accidents, identification of hot spots, classification on the basis of age, collision type, weather type, vehicle type, sex, time, safety device, alcohol/drugs usage, age profile, local condition, maximum accidental chainage., victim's age and reporting cases of fatalities, injuries requiring hospitalization. The Patrolling team comprising of four (4) personnel are responsible for patrolling round the clock and preparation of Patrolling Vehicle Inspection Report on daily basis. The Control Room office receives call in case of emergency and conveys the information to Paramedical staff that further informs police and sends Ambulance to the location of the accident. The First Information Report (FIR) is filed at the local police station and a copy is kept for records. The patient is shifted using ambulance owned by AHBL to the nearest hospital. The Accident Investigation Reporting (AIR) records are maintained which comprises of location and details of the incident/accident, reporting cases of First Aid injury/Fatalities however the copy of FIR is not enclosed in the Report as per Road Accident Data Form A1 (Second Revision) specified by Indian Road Congress (IRC: 53-2012).
- The accident/Incident records were available for review and noted in order. A copy of accident data report for the year 2016 maintained on site was available for review, as provided in Table 4-1. Further, AHBL

maintains manual records for Accident/Incident Reporting and a copy of road safety accident compliance report was present at the site and was reviewed.

- It was observed that a Safety Committee has been formed at the site level comprising of AHBL personnel. Meetings of the Safety Committee are held every month with worker representatives and minutes (points discussed and actions undertaken) and attendance records have been maintained for these meetings as reviewed by the documents provided.
- It was noted that AHBL has its own policy of celebrating safety week in every year. It was observed that each Departmental Heads are committee member of HSE Committee and every month site HSE Officer is conducting HSE Committee meeting and discussing HSE issue in meeting.
- It was also noted that adequate safety measures like towing of damaged vehicles from the carriageway to safe location, shifting of injured people to the nearest hospitals, first aid treatment to injured person, information of accidents to the nearby police station and temporary traffic diversion by use of traffic safety equipment have been undertaken by AHBL.
- The Preventive Action Plan/safety measures undertaken are recorded and maintained by AHBL on site which was available for review and given below in **Table 4-1**.

Table 4-1: Details of accidental data in the year of 2016 maintained at site

Sr. No.	Date	Accident Location	Nature of Accident	Classification of accident	No. of affected persons				Help provided by ambulance / private vehicle
					Fatal	Grievous	Minor	Non injured	
1	01-Jan	Rural Area @ Km. 449.500 RHS	Rear end collision	Fatal	NIL	NIL	2	NIL	Help Provided by other Vehicle
2	20-Feb	Rural Area @ Km. 431.200 RHS	Head on collision	Fatal	2	Nil	Nil	Nil	Help Provided by Patrol Vehicle
3	18-Mar	Rural Area @ Km. 451.500 RHS	Road Crossing	Minor	Nil	Nil	1	Nil	Help Provided by AHBL Ambulance
4	23-Mar	Rural Area @ Km. 448.200 RHS	Road Crossing	Grievous	Nil	2	2	Nil	Help Provided by AHBL Ambulance
5	24-Mar	Rural Area @ Km. 484.000 LHS	Run of the Road	Fatal	1	Nil	Nil	Nil	Help Provided by Patrol Vehicle
6	25-Mar	Rural Area @ Km. 443.740 RHS	Run of the Road	Fatal	1	0	13	Nil	Help Provided by AHBL Ambulance
7	02-Jun	Rural Area @ Km. 445.900 RHS	Rear end collision	Grievous	0	1	1	Nil	Help Provided by AHBL Ambulance
8	03-Jun	Rural Area @ Km. 448.300 LHS	Road Crossing	Minor	0	0	1	Nil	Help Provided by AHBL Ambulance
9	10-Jun	Urban Area @ Km. 453.400 LHS	Rear end collision	Minor	0	0	1	Nil	Help Provided by AHBL Ambulance
10	15-Jun	Urban Area @ Km. 453.100 LHS	Road Crossing	Grievous	0	1	1	Nil	Help Provided by AHBL Ambulance
11	16-Jun	Urban Area @ Km. 453.700 LHS	Road Crossing	Grievous	0	1	0	Nil	Help Provided by AHBL Ambulance
12	30-Jul	Rural Area @ Km. 439.820 LHS	Rear end collision	Fatal	1	0	0	Nil	Help Provided by AHBL Ambulance
13	30-Jul	Rural Area @ Km. 463.900 RHS	Head on collision	Grievous Injury	0	1	1	Nil	Help Provided by AHBL Ambulance
14	28-Aug	Urban Area @ Km. 453.400 RHS	Road Crossing	Minor	0	0	1	Nil	Help Provided by 108 Ambulance
15	24-Aug	Rural Area @ Km. 480.900 LHS	Rear end collision	Minor	0	0	1	Nil	Help Provided by AHBL Ambulance
16	22-Sep	Rural Area @ Km. 468.300 RHS	Rear end collision	Fatal	1	0	1	Nil	
17	26-Sep	Rural Area @ Km. 448.300 RHS	Road Crossing	Minor	0	0	2	Nil	Help Provided by AHBL Ambulance

Source: Sendurwafa Toll Plaza

Table 4-2: Safety measures undertaken for preventing occurrence of Accidents

Chainage	No. of Accidents	Reason of accident	Safety measures provided
444+000	2	Unauthorised median opening	Unauthorised median opening closed
447+000	2	Unauthorised median opening	Unauthorised 460median opening closed
448+000	2	Height of median plants is more than 1.5 m near median opening	Height of median plants is now cut up to 1.0 m
449+000	3	Height of median plants is more than 1.5 m near median opening	Height of median plants is now cut up to 1.0 m
451+000	4	Pedestrian & cycles are traveling on 4 lane	Service road is already provided. Pedestrian & cycles should be travel on service road and highway police should Challan and insist to public for use of service road.
454+000	4	Pedestrian & cycles are traveling on 4 lane	Service road is already provided. Pedestrian & cycles should be travel on service road and highway police should Challan and insist to public for use of service road.
444+000	2	Unauthorised median opening	Unauthorised median opening closed

Source: Sendurwafa Toll Plaza

- The patrolling team inspection Report, Report prepared by Incident Management Team for handling incident/emergency situations, and accident safety measures on monthly basis are recorded and maintained by AHBL on site which was available for review.
- One (01) ambulance services equipped with stretcher, first aid medicines, Cardio-Pulmonary Resuscitation (CPR) and Oxygen Cylinder, mobile communication, medical attendant have been deployed and observed to be stationed at Sendurwafa toll plaza site office to attend to any emergencies arising out of road accidents.
- It was observed that one (01) first aid box is being kept at the Toll Plaza and one (01) at Lakhani camp office.
- It was noted that personal records of employees including medical reports and fitness certificates were made available for review. Health check-up is being carried by Shri Shyam Hospital and Trauma centre for AHBL employees on annual basis and records were maintained by AHBL site office and toll plaza which was available for review.
- Tool box talks are conducted regularly twice in a week and briefings regarding workers/road users safety are provided. Register with details pertaining to tools issued on daily basis was observed to be maintained at the site office.
- The Group Medclaim Insurance applicable to all employees covers life insurance of all the employees from 28th February, 2016 till 27th February, 2017
- The records for drinking water quality on quarterly basis at Lakhani Camp Office is also maintained however the drinking water quality records at Toll Plaza have not been maintained.
- It was observed that the water abstracted from borewell is used for drinking purpose after Reverse Osmosis (RO). On the basis of review of First Aid Register from March, 2016 till April, 2016 around thirty (30) cases of dysentery, diarrhea and stomach ache were observed which could be a sign of water-borne disease as a result of consumption of borewell water supply. Further, water quality monitoring for assessment of fecal contamination, heavy metals is not carried out except maintaining daily records of TDS.
- It was also observed during the site assessment that round the clock highway patrolling is being done by two (02) patrolling vehicles for security and safety of the project and to prevent the unauthorized encroachment/obstruction in the entire stretch of the road.

- It was observed that emergency contacts numbers (of police station, fire station and hospital) were displayed at toll plaza and Lakhani camp office.
- Fire extinguishers of CO₂ type and DCP type are kept at toll plaza site office. Fire extinguishers were placed at the entrance corridor of the main toll plaza building was observed to be valid. AHBL toll plaza site office undertakes monthly inspection of fire extinguishers at site and maintains records of the same. A layout plan displaying the toll plaza office and other facilities were displayed at the entrance of Toll Plaza office.
- The site reportedly has two (02) first aid boxes with medical provisions for employees. The management has also tied up with the Shri Shyam Hospital and Trauma Centre, in case of medical emergencies.
- Attendance records relating to Mock Drills, Trainings on Emergency Preparedness and Response and Fire Extinguishers Demo have been maintained on site.
- The Protective Personnel Equipment (PPE) inventory for PPE's issued at Site and the records for PPE's issued and available in stock has been maintained on site
- It was noted that monthly inspection checklist of road safety has been maintained at Toll plaza and Lakhani camp office and was available for review

Gap:

- The copy of FIR is not enclosed in the Report as per Road Accident Data Form A1 (Second Revision) specified by Indian Road Congress (IRC: 53-2012)
- There is no record keeping for drinking water quality assessment at Sendurwafa Toll Plaza

Recommendation:

- It is recommended that records of FIR for the accidents should be maintained as per Road Accident Data Form A1 (Second Revision) specified by Indian Road Congress (IRC: 53-2012)
- It is recommended that quarterly monitoring of drinking water quality needs to be carried out at Sendurwafa Toll Plaza, Lakhani Camp office and records to be maintained.

4.2.8 Workers Engaged by Third Party

Requirement 19: *The client will establish policies and procedures for managing and monitoring the performance of third party performers and that the workers have access to grievance mechanism.*

Observation 19:

As reported by AHBL Site Management, all employees are engaged by ACL. Contract Labour License under Contract Labour (Regulation and Abolition) Act, 1970 and Central Rules, 1971 has been obtained for AHBL and was available for review during the site assessment.

Gap:

- None

Recommendation:

- None

4.3 Performance Standard (PS) 3: Resource Efficiency and Pollution Prevention

4.3.1 Resource Efficiency

Requirement 20: *As per Performance Standard-3, the project is required to implement technically and financially feasible and cost effective measures for improving efficiency in its consumption of energy, water, as well as other resources and material inputs, with focus on areas that are considered core business activities. Such measures shall integrate the principles of cleaner production into product design and production processes with the objective of conserving raw materials, energy, and water.*

Observation 20:

- **Permission for Water Extraction:** It was observed that two (2) underground bore-wells are being used by AHBL for water abstraction at Sendurwafa toll plaza office and Lakhani Camp Office.
- However, No Objection Certificate (NOC) for abstracting ground water from Central Ground Water Authority (CGWA) has not been obtained. Reportedly, AHBL has filed an application in CGWA for consumption of borewell water for meeting water requirements
- **Water Consumption:** It was reported that 35000 litres/day at Lakhani camp site office and 18000 litres/day at Sendurwafa toll Plaza water is currently being used for drinking, sprinkling of median and avenue plantation for the entire road stretch. This water is sourced from bore well.
- The water consumption records are manually maintained and water meters have not been installed for estimating water requirement at Toll Plaza office and Lakhani Camp Office

Gap:

- Water meters for estimating water drawl quantities have not been installed.

Recommendation:

- The Water meter needs to be installed at Lakhani Camp office and at Sendurwafa Toll Plaza for estimating water withdrawal quantities

4.3.2 Pollution Prevention

Requirement 21: *As per Performance Standard-3, the client is required to avoid the release of pollutants or, when avoidance is not feasible, minimize and/or control the intensity and mass flow of their release. This applies to the release of pollutants to air, water, and land due to routine, non-routine, and accidental circumstances with the potential for local, and impacts. Where historical pollution such as land or ground water contamination exists, the client will seek to determine whether it is responsible for mitigation measures.*

Observation 21:

- **Waste Collection:** During the site assessment, it was observed that dedicated trash bins (one for wet waste and other for dry waste) have been kept at Toll plaza location. The records for Paper Waste/Wood waste, Plastic Waste, Kitchen waste and Used Oil/Lubricant waste is maintained on monthly basis along with records for generation of waste, disposal records, location of storage and action plan for handling waste as per ABL/FR/CO/DO/PR/HSE/06 dated 4th January, 2014.
- **Waste Management:** It was reported that hazardous waste handling and management for the generation of used oil/ waste oil from D.G set maintenance, which is considered Hazardous as per Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 is being carried out by M/s. Plus Lubricants which is authorized for handling Used Oil as per Consent received from Maharashtra Pollution Control Board vide Consent No. BO/MPCB/RO/(HO)/Kalyan/COR/B4545. The quantitative estimates of Used Oil generation on monthly basis are maintained by AHBL at Toll plaza office.
- **Pollution Monitoring:** The quarterly monitoring on Air Quality and Noise levels at Lakhani Camp office and Toll Plaza is carried out and records are being maintained at Toll Plaza office. Results of the monitoring have been carried out on 30th June, 2016 and report was verified during site visit.
- As reported by the Site Management, AHBL owns seven (07) vehicles including two (02) Ambulance, one (01) Bolero, one (01) Indica, One (01) crane, One (01) ambulance, two (02) route patrolling vehicle, Pollution under Control (PUC) Certificate for all vehicles has been obtained dated 12th August 2016 and valid up to 11th February 2017 same was verified during site visit and was found to be within the permissible limit. Pollution under Control Certificate (PUC) of the hired vehicles, used at site was verified at the time of site visit.
- As reported by site management no chemical pesticides are used for the plantation along the road stretch. Organic manure is being used for maintaining the plants.
- **Greenhouse Gas (GHG) emission inventory:** During this desktop assessment, records pertaining to CO2 emission generation have been scrutinized for year 2016. AHBL maintains monthly inventory of its GHG emissions from toll plaza area and from its other O&M activities. Approximately 250 tonnes and 208.7

tonnes of CO2 equivalent were generated in year 2016 from direct fuel burning and indirect energy consumption respectively

Gap:

- None

Recommendation:

- None

4.4 Performance Standard (PS) 4: Community Health Safety and Security

4.4.1 Community Health and Safety

Requirement 22: The client will evaluate the risks and impacts to the health and safety of the affected communities during the project lifecycle and will establish preventive and control measures consistent with good international industry practice or other internationally recognized sources. The client will identify risks and impacts and propose mitigation measures that are commensurate with their nature and magnitude. These measures will favour the avoidance of risks and impacts over minimization

Observation 22:

- As observed during the site assessment, communities reside about 150 m - 600 m from the operational road asset. The guidelines and standards set down by the Indian Road Congress (IRC) and Ministry of Road Transport and Highways (MoRTH) are used by AHBL for maintenance and operation of the road asset.
- It was observed that five (05) major junction, thirteen (13) minor junction, three (03) pedestrian, eight (08) vehicular underpasses and 28.05 km length service road have been provided for the safe passage of cattle owned by communities residing within the vicinity of the operational road asset.
- During the site assessment, it was observed that warning signs, mandatory signs, informatory signs, direction signs and hazard markers were displayed to serve all road users and communities residing adjacent to the road asset. It was also observed that rumble strips and pedestrian marking arrow have been marked at bus bays and truck lay bay location.
- It was observed during the site assessment that highways lighting including twenty eight (28) high mast lighting have been provided at major junctions service roads and at toll plaza location to avoid accident.
- Two (02) ambulance services equipped with stretcher, first aid medicines, mobile communication and a medical attendant have been deployed and observed to be stationed at toll plaza site office to attend to any emergencies arising out of road accidents.
- The road signages on shoulder and median displayed includes reflective boards for Road Closed Signs, Caution Signs, and Slow Signs. It was observed that a Road-Side Inspection Report on Warning signages is prepared on monthly basis. However during Site Visit, no display of warning signages on speed breaker and speed limits near Sendurwafa Toll Plaza, Railway crossing at chainage +km 442.800 and near Nawegaon Wildlife Sanctuary at chainage +km 420.35 to +km 422.340 was observed which can lead to fatal accidents.
- Two (02) ambulance services equipped with stretcher, first aid medicines, CPR, Oxygen cylinders, mobile communication and a medical attendant have been deployed and observed to be stationed at toll plaza office and Lakhani Camp office to attend to any emergencies arising out of road accidents.

- AHBL has developed and maintained a procedure for community grievance redressal mechanism. It was also noted that records of community Grievances Redressal and corrective action was available for review.

Gap:

- No signage boards installed for indicating for speed breaker and speed limit signage near Sendurwafa Toll Plaza, Railway crossing at chainage +km 442.800 and near Nawegaon Wildlife Sanctuary at chainage +km 420.35 to +km 422.340

Recommendation:

- Monitoring inspections needs to be conducted by Patrolling Team and EHS officer deputed at Toll Plaza on monthly basis for ensuring display of warning signages. Further, display of speed breaker and speed limit signage near Sendurwafa Toll Plaza, Railway crossing at chainage +km 442.800 and near Nawegaon Wildlife Sanctuary at chainage +km 420.35 to +km 422.340 needs to be carried out.

4.4.2 Security

Requirement 23: As per Performance Standard 4, AHBL is required to assess risks posed by its security arrangements to those within and outside the project site. In making such arrangements, AHBL will be guided by the principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of such workers, and by applicable law.

Observation 23:

AHBL has deputed twenty one (21) security staff through manpower supply M/s ATR Infraprojects. The security staff includes one (1) head guard and sixteen (16) lane assistant and four (04) gunmen work in three (3) 8-hourly shifts. It was reported that the security staff are from nearby villages. The security personnel were observed to be un-armed since the project does not require deployment of armed personnel. The security staffs were provided with proper guard room at the toll plaza office and have access to drinking water and toilet in the main toll plaza office building.

Trainings for Security guards have been provided for fire-fighting and first aid. However, training on aspects such as dealing with communities has not been initiated on site.

Gap

- None

Recommendation:

- None

4.4.3 Emergency Preparedness and Response

Requirement 24: The client will assist and collaborate with the Affected Communities, local government agencies, and other relevant parties, in their preparations to respond effectively to emergencies, especially when their participation and collaboration are necessary to respond to such emergencies.

The client will document its emergency preparedness and response activities, resources, and responsibilities, and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties.

Observation 24:

- AHBL has developed an on-site Emergency Response Plan. Emergency contact numbers were seen displayed at camp and toll plaza site office, and also at bus stops (in English language). Emergency Response and evacuation plan is displayed at toll plaza site office and Lakhani camp.
- Fire drill and mock drills are undertaken at site as part of Emergency Response Plan. Mock drill schedule of AHBL for 17th September 2016 was reviewed at the time of site visit.

- The Off-Site Disaster Management Plan has also been prepared for addressing the cases of Flood, Earthquake, Cyclone and Lightning along with contact details for Emergency Response situations.

Gap:

- None

Recommendation:

- None

4.5 Performance Standard (PS) 5: Land Acquisition and Involuntary Settlement

4.5.1 Land Acquisition and Resettlement

Requirement 25: *The Client will consider feasible alternative project designs to avoid or minimise physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.*

Observation 25:

- The land acquired for the operating road asset was undertaken in March 2008 and completed in December 2010.
- As per review of the RAP, the land acquired for the project comprised of 123 hectares in total, out of which 93 hectares was private land, 20 hectares was government, 1 hectares was religious land owned by village communities. The land acquisition for the project commenced on 28th February 2008 and ended in 2009.
- A total of 1579 private land parcels from 30 villages have been acquired by the project. The details of compensation awarded along with the land acquired from each village have been provided below.
- As per the 3D List published for the project, there is approximately 1579 land owners/co-owners mentioned.
- Encroachment: As per the site visit undertaken and interviews held with AHBL representative, it was noted that no encroachment (either temporary or physical) were observed along the entire road stretch. Hence, the entire road asset is free of any types of structures on both sides.
- **Stakeholder Consultation:** As reported by AHBL representatives, no concerns have been expressed by stakeholders in the public domain. No information on the grievances raised by the affected landowners since the project planning stage could be retrieved from NHAI. In addition, no instances of protests or civil action related to environmental impacts, land/ROW acquisition, labour working conditions, occupational health and safety and community health and safety have emerged during the operational stage of the road asset, reportedly.

Table 3-3: Details of Land Acquired for the Project

Name of the Village	Total number of land owners and share holders	Total Land Acquired (sq.m)	Total Compensation paid
Soundad	28	5495	12753962
Futula	16	3824	4170632
Sawangji	74	24297	6589531.1
Bamhani	31	10072	2794922
Kohamara	57	24885	9310500.4

Nainpur	22	14496	3323547.1
Doepayali	14	8765	2165302.5
Bamhani/Khadki	24	15908	3688285.6
Dongargaon	29	10986	4334471.6
Khurshipar	24	12965	3181105.4
Maramjob	28	27930	8652344.8
Deori	86	14729	13189011.8
Shirpur	38	17549	5742945.7
Dighori	29	22232	5008081
Singhori	4	1000	229930
Kaknagadh	23	10204	2053653.8
Kanhalmoh	58	22393	5003553
Dhargaon	66	19359	5908729.2
Makardhokada	2	3024	970997.6
Ukara	6	1405	479105
Wirshi	37	14308	4905787.1
Sendurwafa	58	16085	5603307.3
Sakholi	62	22626	33881060
Jambhadi	40	17983	5493439.6
Mundipar	76	23621	10260695.6
Pimpalgaon	172	36400	11379599.8
Manegaon	106	37654	14800469
Lakhani	254	20304	31273265
Murmadi	67	8504	13225878
Gadegaon	48	52798	16859432
Total	1579	521801	247233545

Gap:

- None

Recommendation:

- None

4.6 Performance Standard (PS) 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Protection and Conservation of Biodiversity

Requirement 26: Performance Standard 6, recognizes that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are fundamental to sustainable development. The requirements set out in this Performance Standard have been guided by the Convention on Biological Diversity, which defines biodiversity as “the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems.

Observation 26:

- As per the EIA Report the project has insignificant impact on flora and fauna in the area. There are no major wildlife migration routes or wetlands, no Wildlife Sanctuary or National Park located within 10km on either side of the highway throughout the entire stretch of the operating road asset. The site observation and consultations conducted with AHBL representatives along with review of maps confirms that the operated road asset does not pass through any critical natural habitat.
- It was observed that the Nawegaon Wildlife Sanctuary patches fall near AHBL road alignment at chainages +km 420.350 km- +km 422.340, +km 431.820 – +km 434.694 and from +km 458.172-+km 461.250 however; AHBL has not constructed road in this stretch as Forest clearance for this particular stretch was not obtained. However, warning signages have been put up by AHBL management adjacent to the road operated by AHBL near chainage +km 420.350 and +km 461.250.
- The avenue and median tree plantation has been carried out by AHBL and the details are given below in **Table 3-3**.

Table 4-3: Tree Plantation Details

S. No.	Chainage No.		LHS	RHS	Total	Median
	From	To				
1	405.000	420.000	1070	1139	2209	11051
2	422.000	431.000	1012	775	1787	7981
3	434.000	445.000	748	821	1569	6101
4	445.000	458.000	1903	1740	3643	9271
5	461.000	470.000	1126	1328	2454	4344
6	470.000	485.000	2206	1927	4133	8404
7	Existing Plants Maintained By ABL Along Highway		540	337	877	7
8	Plantation at various Schools, Hospitals, Aanganwadi, Grampanchayat along Highway		262	158	420	8
9	Toll Plaza		400	350	750	9
10	Plantation at Lakhani Camp Area			559		10
Total			9267	9134	18401	47152

- As per the details provided by AHBL, 18401 nos of plants have been planted on the avenue side and 47152 nos. plants on the median side. The plantation activity was completed on 4th July, 2014

Gap:

- None.

Recommendation:

- None.

4.7 Performance Standard (PS) 7: Indigenous Peoples

Requirement 27: Recognizes that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development.

Observation 27:

- The Operating Road Asset does not pass through any scheduled area as observed during the site visit and consultations undertaken with site representatives.

- It was noted that the communities residing near the operating road asset live about 150-600 m from the road stretch and no tribal population reside within the vicinity of the road asset.
- As per review of the RAP and EIA Report no tribal land was not taken nor was any loss of access to land or resources of which tribal population are dependent was noted. Therefore, PS 7 on Indigenous Peoples does not get triggered in this case.

Gap:

- None

Recommendation:

- None

4.8 Performance Standard (PS) 8: Cultural Heritage

Requirement 28: Recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this Performance Standard aims to ensure that clients protect cultural heritage in the course of their project activities.

Observation 28:

As per review of the EIA Report reviewed no structures of archaeological, paleontological, historical, cultural and artistic significance were adjacent to the road asset.

Gap:

- None

Recommendation:

- None

5. Corrective Action Plan

The following **Table 5-1** provides a delineates the list of actions required to be undertaken to ensure closure of the gaps along with roles and responsibilities, identification of measures to be undertaken for closure of the issues and timelines for implementation.

Table 5-1: Corrective Action Plan

Item No.	Corrective Actions	Priority (Low/Med./High)	Responsibility	Estimated cost	Expected Deliverables (Report/Measurement)	Deadline (months)
1.	IFC Performance Standards					
1.1.	Safety monitoring inspections	Medium	HSE Officer-AHBL and Report to Corporate	Budget within existing resources	<ul style="list-style-type: none"> Monitoring inspections needs to be conducted by Patrolling Team and EHS officer deputed at Toll Plaza on monthly basis for inspecting condition of warning signages/ sign boards. ABHL to install sign boards for speed breaker and speed limit near Sendurwafa Toll Plaza, Railway crossing at chainage +km 442.800 and near Nawegaon Wildlife Sanctuary at chainage +km 420.35 to +km 422.340. The sub-contractors engaged should maintain daily safety inspection reports including that of lifting tools and tackles and submit the same to HSE officer, AHBL. Further, AHBL needs to ensure that all non-conformances observed should be resolved within a timeframe of fifteen (15) days 	Fifteen (15) days
1.2.	Grievance reporting and communication	Medium	Project Head , Toll manager and site HRD & HSE Team	Budget within existing resources	<ul style="list-style-type: none"> ABL/AHBL is recommended to update to develop an external grievance reporting and communication system under current Grievance Redressal Mechanism procedure. 	Two (2) month
1.3.	Maintaining records for drinking water quality assessment	High	Project Head Site HRD Team	Budget within existing resources	<ul style="list-style-type: none"> AHBL to ensure that the quality of drinking water supplied to direct and indirect workers meets the IS drinking water quality standards. Water quality testing needs to be carried out at Toll Plaza and Lakhani Camp office to determine fecal contamination. 	One (1) month
1.4.	Periodic monitoring of EHS Performance reporting by engaged subcontractors is	Medium	Project Head Site HRD Team	Budget within existing resources	<ul style="list-style-type: none"> AHBL needs to update sub-contractor's EHS Performance reporting, monitoring and assessment on monthly basis and conduct internal audits at frequent intervals. 	One (1) month

Appendix A Document copies

A.1 Strip Plan for the Project

Way to Durg



STRUCTURE LOCATION			RIGHT SIDE				
Major / Minor Bridges	Vehicular Underpass	Junctions and Toll Plaza	Service Roads	Type of pavement	Chainages	Type of pavement	Service Roads

0

Bag River Bridge
405.030



405.00



406.00

407.00

408.00

409.00

410.00

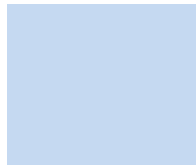
411.00

412.00

413.00

Deori Nallah Bridge
414.680





414.00

415.00

416.00

417.00

418.00

419.00

Reserve forest Area 420.350	420.00	Reserve forest Area 420.350
	421.00	
Reserve forest Area 422.340	422.00	Reserve forest Area 422.340
	423.00	

Loha River Bridge
427.520

423.00

424.00

425.00

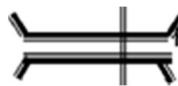
426.00

Dongaragaon Over Bridge
427.000

427.00

428.00

Bahmni Over Bridge
429.420



429.00



430.00




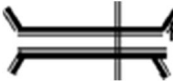
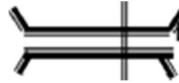


Nainpur
Over Bridge
434.900

Reserve forest Area 431.820	431.00	Reserve forest Area 431.820
	432.00	
	433.00	

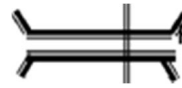


Chulbandh
River Bridge
441.700

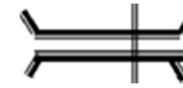
	435.00	
	436.00	
	437.00	
	438.00	
	439.00	
	440.00	
	441.00	
Railway crossing 442.800	442.00	
	443.00	
	444.00	
	445.00	
	446.00	
	447.00	
	448.00	

	Sendurwafa Toll Plaza 449.260		449.00	
Kapori Nallah Bridge 450.000			450.00	
Senurrwafa Over Bridge 450.800			451.00	
			452.00	
			453.00	
	Lakhandur Underpass Bridge 454.200		454.00	
Jumri Nallah Bridge 455.580			455.00	
			456.00	
			457.00	
Teli Nallah Bridge 458.000			458.00	
	Reserve forest 458.172			Reserve forest 458.172
			459.00	
			460.00	
	Reserve forest 461.250		461.00	Reserve forest 461.250

Mundipar Over Bridge
462.800



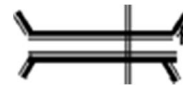
462.00



463.00

464.00

Pimpalgaon over bridge
465.820



465.00



466.00

467.00

Parking Zone
468.620

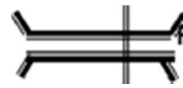


468.00

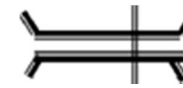
468.00 Lakhani Camp

469.00

Lakhani Masan Bridge
470.000

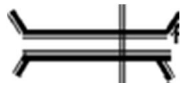


470.00



471.00

Murmadi Bridge
472.000



472.00

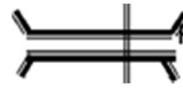


Truck Parking Truck Parking

473.00

474.00

Gadegaon
Over Bridge
475.500



475.00

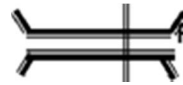


476.00

477.00

478.00

Kanhalmoh
Over Bridge
479.000



479.00



480.00

481.00

482.00

483.00

484.00

Jor Nallha

485.00



Way to
Nagpur

A.2 List of documents reviewed

S.No.	List of Docs Reviewed
1.	Letter submitted to NHAI regarding encroachments vide letter no. ABL/NH-06/BOT/MS/II/954 dated 20 th September, 2016
2.	Work Order of M/s. Ashoka Buildcon Limited vide WO no. AHBL/ABL/Bhandara/NH-06/2013-14/01 dated 3 rd March, 2014
3.	Sample copy of Monthly Legal Matrix Report of September, 2016
4.	Water consumption records of September, 2016
5.	Road Accident Summary records of September, 2016
6.	Monthly Grievance Register vide doc. No. FR/CO/DO/PR/HRD/22 dated May, 2016
7.	Signed copy of Guidelines for Grievance Redressal mechanism for SP/EPC vide doc. No ACL/HSE&S/ESMP-GCRM/01 dated 21 December 2013
8.	Copy of Environmental Clearance vide letter no. 5-18/2007-IA.III dated 11 th June, 2007
9.	Provisional Completion Certificate vide letter No. ZL-AP/NH-6/IC/03/2010-11/501 dated 19 th August 2010.
10.	Labour licence dated vide letter No. ALCN /46(L)/66/2013-CL dated 9 th May 2016
11.	Signed copy of Human Resource Manual Dated 04 th January 2014
12.	Certificate of Registration to ISO-18001:2007; 14001:2004; ISO 2009:2008
13.	Copy of Abstract under minimum wages Act and Rule
14.	Quality Health Safety and Environmental policy (in English and local language) dated 1st August 2013
15.	Display layout of Emergency Response and Evacuation plan
16.	Muster Roll register dated 22 September to 22 October 2016
17.	List of emergency contact numbers
18.	HSE performance dated July-September 2016
19.	List of Employees
20.	Copy of Organisation chart
21.	Record of Customer Complaints
22.	Record of Corporate Social Responsibility record
23.	List of Security guard deputed on site and Toll plaza
24.	Six Monthly environmental monitoring report dated 30 th June 2016
25.	Signed copy of Standard Operating Procedure for incident management plan dated January 2014
26.	Environmental, Social and Safety Management Plan dated 2 nd February 2015
27.	Group Medical Claim Insurance Policy dated 29 th February 2016
28.	Health, Safety and Environment (HSE) manual dated 30th July 2016
29.	Incident records checklist
30.	Accident report dated August 2016
31.	Records of health check-up conducted for site staff employee by Shree Shyam Hospital and Trauma centre dated 26 th January 2016.
32.	Crane fitness test certificate, Chief Inspector of Factories, Govt of C.G. Nagpur valid upto 7 th January 2017
33.	Signed copy of Traffic Management Plan Report dated 04 th January 2014.
34.	Training record of code of conduct, Electric safety, emergency planning and road safety dated 05 th February 2015
35.	List of trees planted at toll plaza and surrounding
36.	Copy of Tree cutting permission, Forest Regional Office, Bhandara dated 18 th November 2006
37.	Factory Licence M/s ATR Infraprojects Pvt limited dated 09 th February 2013
38.	Online Accident Reporting and Analysis Software
39.	HSE Performance Monitoring Reports (July-Sep, 2016)
40.	Quarterly Tree Plantation records (September, 2016)
41.	Concessionaire Agreement with NHAI dated 18 th September, 2007
42.	Provisional clearance by Electrical Inspectorate for installation of 40 KVA, 415 V DG Set at

Sendurwafa Toll Plaza vide dated 4th November, 2011

43.	55 kW Load Sanction Certificate for Sendurwafa Toll Booth from MSEDCL vide order no. EE/SKL/LS/02 dated w1st April, 2010
44.	Land Acquisition and Compensation details
45.	Environmental Management and Monitoring Plan
46.	Gap Analysis Report (2009)
47.	Environmental Statement for FY ending 31 st March, 2015 and letter no. ATR/BHAN/Site-Lak./2015 dated 24 th April, 2015
48.	NOC for operation of Hot Mix Plant of ATR Infraprojects at Manegaon
49.	MRM Presentation of HR Department dated 2 nd March, 2016
50.	Details on Hazardous waste generation including records and authorized vendor for handling Used Oil, Delivery Challan and Invoice for Approved Agency
51.	Environmental Management and Monitoring Plan
52.	Inventory of BC Main Carriageway, Periodic Maintenance Plan, Warning Signages, Daily Monitoring Progress Reports
53.	Work Order of M/s. ATR Infraprojects vide WO no. ABL/BHDR/EQA/88 dated 1 st June, 2016
54.	Photographs on Warning signages displayed near Navegaon Nagzira Tiger Reserve
55.	CTO from MPCB of M/s. Plus Lubricants (authorized vendor) for handling Hazardous Waste
56.	IMS Manual
57.	HSE Code of Conduct for Contractors
58.	Emergency Response Plan, Emergency Evacuation Plan, details of Emergency Communication Response Team along with SOP for Incident Management
59.	QHSE Policy in English and local language) dated 1st August 2013
60.	Details on Fire Extinguishers, its type and location
61.	Fire Extinguisher Report dated November, 2016
62.	Change of Land Use Certificate at Lakhani Camp dated 15 th November, 2006
63.	Risk assessment report dated September 2016
64.	Consent to Operate for Crushing unit vide letter No.MPCB/14/5589 dated 11 th June 2014
65.	Supplementary copy of Environmental and Social Impact Assessment
66.	Annual Operation and Maintenance Plan
67.	Chainage wise list of High Mast light
68.	Summary of road furniture details
69.	Details of man power for July 2016
70.	Register of Wages of Aug. 2014
71.	Community engagement photographs and register
72.	List of temple reconstructed and shifted
73.	Presentation on Road safety Campaign held on 2016
74.	Over time register for July 2016
75.	ATR, ABL Muster Emp. List and Card Emp. List (Lakhani) dated 25 th October 2016
76.	HR Policy revised on Aug 2015
77.	HR Dept. MRM Presentation Lakhani dated 02.3.2016
78.	Land Acquisition award for 7 villages
79.	List of 27 villages coming under project
80.	Employee Compensation Insurance Policy Schedule from 31/03/2016 to 30/03 2017
81.	Punch list items
82.	Socio Environment Strip plan
83.	Rehabilitation Action Plan (RAP)
84.	Land Acquisition report for Package II
85.	3D notification
86.	Note on Study on Land Compensation Price Verification and Compensation plan adapted (Not signed)
87.	Department Procedural manual HRD
88.	Supplementary Environmental and Social Impact Assessment Report
89.	Detailed Project Report (DPR)

A.3 Photo documents reviewed

<p>Photo No.1</p>	<p>Date: 24/10/2016</p>	
<p>Location of photo: Bag Nadi Village</p>		
<p>Description: AHBL Starting Point Chainage +km 405.00</p>		

<p>Photo No. 2</p>	<p>Date: 24/10/2016</p>	
<p>Location of Photo: Sendurwafa Toll Plaza</p>		
<p>Description: No rumble strip at Toll plaza at Chainage +km 449.260</p>		

<p>Photo No.3</p>	<p>Date: 24/10/2016</p>	
<p>Location of photo: Sendurwafa toll Plaza</p>		
<p>Description: First aid box point at toll plaza location</p>		

<p>Photo No.4</p>	<p>Date: 24/10/2016</p>	
<p>Location of photo: Nawegaon Nagzira Tiger reserve</p>		
<p>Description: No rumble strips near Nawegaon Nagzira Tiger reserve (Chainage 420.300)</p>		

Photo No.5	Date: 24/10/2016	
Location of photo: Railway crossing		
Description: No signing board at railway crossing at Soondah (Chainage +km 442.860)		

Photo No.6	Date: 24/10/2016	
Location of photo: Sendurwafa Toll Plaza		
Description: Consultation with first aid box team at toll plaza at Chainage +km 442.260		

Photo No.7	Date: 24/10/2016	
Location of photo: Gadegaon Village		
Description: End point of AHBL Channage +485.00		

