
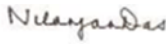


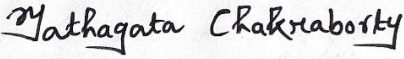




Executive Summary of Environment and Social Impact Assessment for 500 MW Solar Power Project, Badi Sid, District Phalodi, Rajasthan

Adani Green Energy Twenty-Five Ltd

April 29, 2024

Quality information

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Table of Contents

Executive Summary V

Executive Summary

Introduction

Adani Green Energy Twenty-Five Limited (AGE25L) has intended to develop a 500 MW solar power plant on identified land parcels in Badi Sid and Kalyan Singh ki Sid villages of Tehsil Bap, District Phalodi in the state of Rajasthan. AECOM undertook a site reconnaissance visit for the project from 11th to 15th December 2023 to obtain data on the environmental conditions for the various identified parameters along with the social and ecology survey of the site.

Project Location

The proposed project is situated in Badi Sid village (27.45°N, 72.47°E) in Bap Tehsil at Phalodi district of Rajasthan. Adani Green Energy Twenty-Five Ltd plans to develop 500 MW Solar PV Park at Badi Sid and Kalyan Singh ki Sid along with approx. 11 km long 400 kV Transmission Line from site to Bhadla-II PGCIL Substation.

Project Description

The proposed solar power plant is of 500 MW solar power plant located in two villages in Tehsil Bap, Phalodi district of Rajasthan. Jaisalmer Airport is located approximately at 196 km and Jodhpur airport is located at about 185 km from the project site. The project location is in proximity with State / National Highway – 11 and 911. Nearest town is Phalodi which is around 45 km from the project boundary. Project site is divided into 2 separate blocks (one in Badi sid and other in Kalyan Singh ki Sid) with the Lalgarh junction – Phalodi railway line of North Western Railway (NWR) separating them.

The project sites are accessible through metal road (NH11) at approximately 25 meter towards the north along the project location boundary. However, approach road needs to be developed during the construction period of the project for vehicular movement and to carry plant equipment to respective locations within the site.

During the site survey, it was observed that the site represents a typical desert landform, with scattered vegetation and bushes. The elevation of the site is 200-225 m above Mean Sea Level, 180 m to 235 m from north to south and 190 m to 235 m from east to west direction indicating flat as well as few undulating lands.

The proposed project would be set up on 2561.60 acres of land. As per discussion with AGEL and AGE25L representative, government has allotted land for the proposed power plant for 29 years 11 months lease period. Presently, the land allotment process has been completed. Breakdown of land requirement for each component (Installation of solar modules, Site office, Inverter room, Temporary labour camp, and Stock yard) is not available at this stage.

During the construction phase, approx. 800 skilled, semi-skilled and unskilled labours would be employed directly or indirectly. About 25 persons would be employed during the operational phase. Construction equipment such as dozers, scrapers, portable concrete mixers, DG sets, pumps, compressors, rock drills, pneumatic tools, saws, and vibrators would be operated. During construction, concrete and asphalt would be procured by the contractor through portable equipment and from local sources.

Applicable IFC's Performance Standards

Performance Standard 1: Social & Environmental Assessment and Management System

The PS 1 is applicable to projects with environment and/or social risks and impacts. The proposed project is a solar power project and may have environmental and social impacts on air, noise, soil quality, land use, flora and fauna, direct or indirect impact on communities, during construction or operation phase. Hence PS1 is applicable.

Performance Standard 2: Labor and Working Conditions

This Performance Standard is applicable to the Project to review the labour and their working condition, accommodation facilities, drinking water supply, working hours etc. in a high heat stressed area of the project site. Hence PS2 is applicable.

Performance Standard 3: Pollution Prevention and Abatement

The project involves use of resources like land and water. Improper handling of broken and damage solar panel may result in soil contamination. Improper handling of spent oil may lead to contamination of soil and ground water.

Topsoil management is required during site levelling. Construction activities may lead to air and noise emission which need to be merged. Broken/damage solar panels may result in contamination of soil and ground water. Water will be required only for both construction and operation phase along with domestic purpose. Diesel/transfer oil/ spent oil may contaminate soil and water. Hence PS3 is applicable.

Performance Standard 4: Community Health, Safety and Security

The proposed project will involve transportation of construction material and movement of construction machinery which may pose safety risks and to the nearby communities. In addition, fugitive dust emission due to transportation, site clearance, construction work may affect the nearby communities. Hence PS4 is applicable.

Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management

The Project Site, as well as the Area of Influence of the project, contain natural habitats, besides modified habitats. The Project Site and the Area of influence provide important ecosystem services to the local community, including priority provisioning services in the form of water resources and pasture for livestock. The proposed project infrastructure and activities, such as removal of vegetation, levelling of land, construction of access roads, vehicular movement, artificial illumination and installation of solar paneling, are expected to cause loss or degradation of habitats and ecosystem services, as well as fragmentation of habitats. Hence PS6 is applicable.

Environmental and Social Baseline

The baseline environmental quality has been monitored and assessed during the winter season in study area encompassing within 5 km radius around the project site. Baseline monitoring has been carried out from November 2023. Phalodi is very hot and dry during summer season lasting between April to August, windy and chilly winter season lasting between November and February. Phalodi has an average wind speed of 3.5 m/s and maximum wind speed of 12 m/s, ambient average temperature is 27.5°C ranging between 6.7°C to 44.8°C, average relative humidity of 43.3% ranging between 8.4% to 93.5%, and station pressure ranging between 979 hPa to 964 hPa with mean pressure around 995 hPa.

Ambient Air Quality:

The 24-hourly average PM10 concentrations in the monitoring locations varied between 66.775 µg/m³ to 71.605 µg/m³ whereas average PM2.5 concentrations varied between 29.08 µg/m³ to 37.06 µg/m³. Average SO₂ concentrations at the monitoring locations ranged between 6.6 to 6.76 µg/m³. The average NO_x concentrations in the monitoring locations varied between 7.945 to 8.17 µg/m³. Average CO concentration varied between 0.065 to 0.085 mg/m³. Average concentration of PM, SO₂, NO_x and CO are within the permissible limit during the monitoring period.

Ambient Noise Quality:

Ambient daytime noise level (Leq day) in the project area was recorded in the range of 48.9 to 51.9 dB(A) and in the range of 36.8 to 38.2 dB(A) during night-time at the monitoring locations.

Soil Quality:

The soil quality was found to be sandy loamy, strongly alkaline having less organic carbon. Metals such as Lead, Copper, Nickel, and Zinc were detected from the soil analysis, but all the measured values were below the soil remediation intervention values. Whereas the concentration of Arsenic, Cadmium and Mercury in the soil samples were below detection level.

Groundwater and Surface water Quality:

One ground water sample have been examined for physico-chemical, heavy metals and bacteriological parameters. The pH of collected water sample indicates slightly alkaline nature of the water. Metals such as Cadmium, Chromium, Lead, Mercury, Copper, Aluminium, Barium, Arsenic, Manganese, Nickel, Zinc are found below detection limits. Faecal coliform and total coliform are found to be less than <2 MPN/100 ml while E Coli is absent in the collected water sample.

Surface water samples has been collected from two (02) locations. The pH of pond water sample indicates the strongly alkaline nature of the water. Metals such as Cadmium, Chromium, Lead, Mercury, Arsenic, Copper, Aluminium, Barium, Manganese, Nickel, Zinc are found below detection limits. Both the faecal Coliform and total coliform are found below detection level in collected samples. E. coli is not present in collected samples.

Flora

Twenty-four (24) floristic species were recorded collectively at the sampling sites. The study area comprises of eight (08) tree species belonging to four (04) families, six (06) shrubs species belonging to six (06) families and ten (10) herbs species belonging to six (06) families. Concerning the IUCN Red List ver. 2023-1, nine species is Least Concern and rest are Data deficit and not evaluated.

Fauna

Forty-four (44) species of mammals have reported ranges that include the study area. Concerning the IUCN Red List ver. 2023-1, one (01) of these species (Indian Pangolin) is designated as Endangered.

Two hundred (200) species of birds have reported ranges that include the study area. Out of that, (70) species of resident birds have reported ranges that include the Study Area. Out of seventy species, three (03) species (White-rumped Vulture, Indian Vulture and Great Indian Bustard) are designated by the IUCN as Critically Endangered (CR) and three (03) species (Tawny Eagle, Stoliczka's Bushchat and River tern) as Vulnerable.

One Hundred Thirty (130) species of migratory birds have reported ranges that include the study area. Out of these species, one (01) species (Sociable Lapwing) is designated by the IUCN as Critically Endangered (CR), Four (04) of the species (Saker Falcon, White-headed Duck, Egyptian Vulture and Steppe Eagle), are designated by the IUCN as Endangered (EN), and five (05) species (Yellow Eyed Pigeon, Common Pochard, Greater Spotted Eagle, Eastern Imperial Eagle and Asian Houbara), which is designated by the IUCN as Vulnerable.

Thirty-seven (37) species of reptiles have reported ranges that include the study area. Out of thirty-seven species one (01) species (Yellow Monitor) is Endangered, and three (03) species (Mugger, Hardwicke's Spiny-tailed Lizard, Painted Keelback) are Vulnerable.

Five (05) species of amphibians have reported ranges that include the study area. Concerning the IUCN Red List ver. 2023-1 all the reported range amphibian species are least concern.

Details Forest Land present within the Transmission Line Corridor

The proposed 400kV transmission line is passing through 0.23ha roadside plantation area, situated both side of the NH11. As per Rajasthan gazette Notification dated 17th August 1973 the plantation of both side of the Phalodi-Bikaner Road (presently NH11) has been declared as protected Forest. Hence Forest Clearance will be triggered and same has already been applied in 28th November 2023 (Proposal No. FP/RJ/TRANS/451503/2023). Also, one Revenue Forest is present just beside the Transmission line corridor, however neither the Transmission line corridor nor the ROW of Transmission Line corridor is overlapped with the Revenue Forest Area.

Designated Areas

Moreover, the solar project site and the transmission line corridor does not overlap with any internationally recognized area such as Important Birds Areas (IBA), Ramsar Site, World Heritage Site, Man & Biosphere Reserve, Alliance for Zero Extinction Site. Diyatra Closed area, which is an IBA, is situated 32.48 km distance and Khurja Conservation Reserve, Khichen which is also an IBA, is present at 36.6 km distance from the project site.

The Project area is outside of GIB Priority area and Additional GIB Priority Area. The distance from solar project area to the GIB Priority area is 44.54km and Additional GIB Priority Area is 41.68km, whereas the distance from Transmission line to GIB Priority area is 47km and from Additional GIB Priority Area is 45km. However, the project site is fall within GIB Potential area and as per discussion with Forest Department, Local people and secondary sources no GIB has been report in last 15 years from the project site as well as study area.

Impact Assessment

Major Potential impacts of proposed project are:

- Construction works involve earthwork for excavation of the foundation would lead to air quality and noise impacts, but these would not be significant as the project site are away from settlements. In addition, impacts on flora and fauna are also envisaged.
- During the stringing operation winching machine would be used and is expected to have a noise level of approximately 70 dB(A). However, since the transmission line is away from the settlement the noise levels are expected attenuate to levels within standards for residential areas.
- Operational phase involves disturbances to fauna, flora and noise etc. The social impacts will be from movement along the corridor, expectation management and perception about generation of electromagnetic field.
- Gaseous emissions of SO₂, NO_x, CO, and CO₂ due to the movement of trucks and vehicles and some point source emissions like DG set.
- Noise level from construction equipment like dozer, scrapers, portable concrete mixers, generators, pump, rock drills will also generate noise.
- Transportation of raw materials and accidental contamination during storage and handling of fuels and waste materials.
- Soil contamination may result due to accidental spillage and inappropriate storage of diesel or transformer oil.
- Improper disposal of sewage and wastewater from worksite and construction debris

- Increased pollution at nearby settlements due to increased vehicular movements.
- Strictly compliance all the recommendation given by the Committee Constituted by Hon'ble Supreme Court of India for laying of 10.85km long 400kV transmission line.
- Loss or degradation of natural and near-natural habitats. Natural biological cycles will be disrupted due to interruption of the natural night period by light.
- The physical presence of the solar panning and related installations would cause habitat loss, degradation and fragmentation, leading to a reduction in species richness and density.
- Aerially moving fauna, such as insects, birds and bats, may accidentally come into contact with electrical components or the solar panel, leading to injury or death.
- The solar plants typically have security perimeter fencing, which will cause barrier effect for mammals' movement and migration.
- The solar panning and its associated installations would make shadow on the soil underneath, which would degrade or alter the existing floristic and faunal profile leading to impact its existing primary production and ecosystem services.
- The proposed solar panning into the landscape of the largely natural habitat would cause considerable disturbance to the fauna in and around the project site through visual obstruction or visual irritation.
- Moreover, solar PV plant with large continuous arrays and birds can mistake the flat surfaces of PV panels for water bodies and attempt to land on them – termed the 'lake effect' results severe injury and fatality of birds.
- Loss of grazing land and access restriction

Mitigation

- Grievance Redressal Mechanism should be prepared and the same need to be made available to the impacted stakeholders to raise concern and register their grievances.
- If avoidance is not possible, minimise the land to be taken from forest.
- Excavation would be carried out to the minimum and within the project site only.
- Site preparation and development be planned only after a detailed drainage plan has been prepared for site.
- After completion of construction activities, lands used for storage areas, maintenance area would be restored to its original state as much as possible.
- Changes in contour level would be avoided to the extent possible
- Payment of compensation prior to taking possession of land and RoW clearance.
- Periodic water-spraying/sprinkling and sweeping of unpaved and paved roads to minimise dust and remove mud and debris.
- AGE25L would include the specification of low noise generating equipment in their EPC contract documents.
- Oil leakage or spillage will be contained and cleaned up immediately. Waste oil would be collected and stored for recycling or disposal.
- Adequate sanitary facilities, i.e. bio-toilets would be provided for the construction workforce.
- Loading and unloading Standard Operation Procedures (SOPs) would be prepared and followed for diesel and used oil.
- Ensure that all electrical components are adequately insulated to prevent electrocution of fauna through accidental contact with project-installations.
- Bird diverter should be installed in transmission line.
- Prepare incident (collision/accident/mortality) register for faunal species with emphasized on migratory avian species.
- Visual frightening techniques" may be considered to minimize effect of "Lake effect", to frighten any bird trying to land on panels and prevent birds from landing.
- Ensure that operation or maintenance activities, that require illumination, are restricted to daylight hours to prevent The project layout would be prepared in such a way so that any settlement and any structures

falling within the project site must be avoided. The lay-out of the plant would also need to make provisions that may provide access to road for the free commutation of the project affected people and villagers residing within vicinity of project site.

- The project proponent would also provide and disclose adequate project related information to the villagers residing within project area, project affected people and all the stakeholders (villagers, gram panchayat, communities etc) who would be associated directly or indirectly with the project.
- The project proponent would also prepare and formulate Grievance Redressal Mechanism and make the same available to the affected parties to raise their grievances. The grievances addressed to project proponent would also need to be redressed and properly recorded. The project proponent would also need to make the villagers aware of the GRM.
- As part of the community development strategy, the project to provide income-generating activities like a fodder bank and veterinary services for livestock development in the area.
- Grievance Redressal Mechanism should be prepared and the same need to be made available to the impacted stakeholders to raise concern and register their grievances.
- The project has agreed to build an access road, but due to the fragmented nature of the private land parcel, various access locations may not be practicable in the long run. The project proponent should consult with the impacted community to determine appropriate actions.
- The project may possibly look into purchasing the affected private land. In the event of households with less landholdings, the project proponent can look into purchasing replacement land for such vulnerable household in exchange for the affected land.
- Local community would also need to be informed of the restrictions (if any) at least two weeks prior to start of construction.

Perception and Expectations of Stakeholder

The people in the area were in general positive about the project. The people were of the perception that due to lack of livelihood options, large projects were welcome. Presently the population is dependent on the livestock and agricultural produces, which in itself cannot sustain the families. Setting up of power plants in the area would improve the livelihood options of the people. Further, the villagers wanted employment in the plant, especially during the construction period. They were hopeful about generation of indirect employments such as shops, catering, and jobs for security, etc. The other major expectations of the people were improvement of the health care facilities and setting up of the hospital in the area.

Environmental and Social Management Plan

The ESMP provides a delivery mechanism to address potential adverse impacts, to instruct contractors and to introduce standards of good practice to be adopted for project activities taken up during construction and operation phases of the project. Inspection and monitoring of the environmental and social components phase activities will increase the effectiveness of suggested mitigations.

Through the process of inspection, audit and monitoring AGE25L will ensure that all the contractors comply with the requirements of conditions of forest clearance, and other permits including suggested action plans.

The inspection and audits will be done by AGE25L's Environment, Health and Safety (EHS) department as well subject to be reviewed and conducted by external agencies/experts. The entire process of inspections and audits are being documented. The inspection and audit findings are to be implemented by the contractors in their respective areas.

Climate Change Risk Assessment (CCRA)

Adani Green Energy Twenty-Five Limited (AGE25L) intends to develop 500 MW Solar power project in Bap village in Phalodi Tehsil of Dist. Phalodi, Rajasthan. During construction and operational phase, the project could face climate change impacts such as extreme events damaging the project assets. In addition to this, there is a need of emphasis on green and clean energy with low carbon emissions to ensure energy equity and security. Therefore, in accordance with the EP4/TCFD requirements, the current and anticipated climate change risks (transition and physical) associated with construction and operational phase including local community, businesses, customers, and its supply chain in relation to low carbon economy have been addressed.

Following IPCC AR6, projections of the next 20 years from 2020 to 2040 covering construction, commissioning, and beginning of operational design life; and up to 2060 covering ~ 40 years operational design life under SSP2-4.5 and SSP5-8.5 scenario have been considered for physical risks. While for transition risks, SSP1-1.9 and SSP2-

4.5 scenario have been considered as per TFCD and World Energy Outlook, 2021. For transition risks, following timeframes: 2024 to 2028, 2029 to 2038 and beyond 2039 have been considered. For both physical and transition risks, priority risks were classified and ranked as per likelihood and consequence of the climate change. This is followed by mitigation/control measures due to potential loss or damage to assets/workers/activities caused by high wind, heatwaves/heat stress due to high temperature, waterlogging/flood/drought like situation due to increased/decreased precipitation and other weather phenomenon such as lightning strikes, cyclones, and dust storms.

Temperature and precipitation are expected to increase in project area. During construction and commissioning phase, heat stress to workers have been identified as high risk. Moderate risks have been identified on accumulation of dust particles on PV modules and potential damage to health-related issues due to increase dust storm. During operational design life of the project, potential accumulation of dust particles on PV modules due to dust storm deposition is identified as moderate risk. No transition risks have been identified as high as it is a clean energy project. Hence, emission related outcome and activity is expected to be very low. Then, recommendation to manage/control the identified risks during project planning decisions, project design, construction and operational phase have been proposed.

Human Rights Impact Assessment (HRIA)

The HRIA has been conducted to assess the impacts and risks posed by the proposed project on human rights of the various stakeholders associated with the proposed 500 MW Solar Power Plant in Phalodi district of Rajasthan. The HRIA has been prepared by analysing pre-existing studies with on-the-ground information collected through engagement with various rightsholders. The various frameworks which have referred for preparation of HRIA is based on rights enumerated by International Labour Organization Fundamental Conventions; the United Nations Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; and the International Covenant on Economic, Social and Cultural Rights; International Convention on the Elimination of all Forms of Racial Discrimination; Convention for Elimination of all forms of Discrimination against Women. The various conventions of ILO which have been ratified by India and would need to be complied to ensure human rights of rightsholders associated with project are C001-Hours of Work (Industry) Convention of 1919; C0026-Minimum Wage Fixing Machinery Convention of 1928; C029- Forced Labour Convention, 1930; C100-Equal Remuneration of 1951 and C182-Worst form of Child Labour, 1999. The recent International Guidelines which are applicable for the developed of proposed 500 MW Solar Power park include Equator Principle 4, 2020; Guidance Note on Implementation of Human Rights Assessment under the Equator Principles; United Nations Guiding Principles on Business and Human Rights (UNGPs); IFC Good Practice Note (GPN); Managing Risks Associated with Modern Slavery, 2018; Voluntary Principles on Security and Human Rights, 2020 and IFC Good Practice Handbook: Use of Security Forces, 2017. The existing E&S Safeguard Policies of AGEL which also need to be adhered for compliance of Human Rights include HR Policies; Whistle Blower Policy; Resource Convention Policy, Land Policy; Remuneration Policy; POSH; Anti-slavery Policy and Policy against Non-discrimination and Gender Equality.

AECOM team has also referred to various national regulations and Fundamental Rights which have been assured to the people of India by the Indian Constitution. The various Constitutional provisions which need to be adhered by the project proponent for ensuring applicability of human rights are Rights to Equality (Article 14); Right to Freedom of Speech and Expression (Article 19(1) A); Right against Exploitation (Article 23 and 24); Right to Constitutional Remedies: (Article 32); Right to form Association; Right to Social Security; Prohibition of discrimination on ground of religion, race, caste, place of birth etc (Article 15); Right to Life and Personal Liberty (Article 21) and Directive Principles of State Policy (DPSP).

AECOM team has conducted desktop review of satellite imagery followed by community consultation with the various rightsholders to assess how their human rights would be affected by the proposed project and develop appropriate measures to mitigate the same. The proposed solar power plant will be established on government land which is utilized by local community occasionally for grazing livestock (though it not designated) and hence Rights to Livelihood and access to resources will be hampered during the pre-construction period. However, the project proponent can mitigate the same by changing the project layout, implementation of stakeholder engagement plans, GRM and also by implementing community development programmes targeting livelihood enhancement programs for livestock. Further, the Right to work in safe in working condition, Right against any form of discrimination, Right to form unions and association, Right to remedy, Right against employment of child and forced labour, Right to collective bargaining, Right to live in dignity and Right to safe environment will be applicable to the labourers and workforce who would be engaged during construction phase and the right associated with the work force can be protected through implementation of HR Policies, Contractor Management Plan, Stakeholder Engagement Plan, Grievance Redressal mechanisms and Resource management plans. The project will also pose considerable impacts on the Rights to freedom to live to the community residing within study area by causing access restriction, impact on visual aesthetics, waste generation etc, which can be mitigated by project proponent

by implementing waste management plans, building access roads, including the community in decision making processes.

The project proponent would need to implement various plans and procedures to ensure that the basis rights of community, labourers, employees, security guards and all the other rightsholders are not compromised and it would also monitor on timely basis by maintaining records of same.

Conclusion

Applying the criteria stipulated by the IFC Policy on Environmental and Social Sustainability for environmental and social categorization of projects, AGE25L's proposed 500 MW solar project may be assigned as 'Category B' with respect to environmental and social impacts. This is so basis the primary data available to date which indicates that the environmental and social risks and impacts of the proposed project activities are expected to be few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures, which supports the 'Category B' classification. Also, as per CHA study it is found that the proposed project area and/or study area is not a Critical Habitat

