

**Ahmedabad Municipal Corporation
and
Gujarat Urban Development Mission**

**Government of Gujarat
Gujarat Resilient Cities Partnership:
Ahmedabad City Resilience Project
P175728**

**Draft
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

June, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. India, through the Government of Gujarat (GoG) will implement the Gujarat Resilient Cities Partnership: Ahmedabad City Resilience Project (the Project), with the involvement of the Ahmedabad Municipal Corporation (AMC), and Gujarat Urban Development Mission (GUDM), as set out in the Loan Agreement. The International Bank for Reconstruction and Development, has agreed to provide the financing (P175728) for the Project, as set out in the referred agreement.
2. The GoG shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the GoG shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the GoG, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the GoG through AMC and GUDM and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the GoG, the Commissioner of AMC and the CEO of GUDM. The GoG shall promptly disclose the updated ESCP.

Note:

This document is approved vide resolution number: 136 dated 21/06/2022 by Municipal commissioner, Ahmedabad Municipal Corporation

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) ESMP implementation, Monitoring of Environmental parameters as in ESIA Monitoring Plan</p> <p>Submit Annual Third Party Audit to the World Bank</p>	<p>Quarterly reports to the World Bank throughout Project implementation, commencing after the Effectiveness Date. Submit each report to the World Bank no later than 30 days after the end of each reporting period.</p> <p>Audit to be conducted at the end of each implementation year, and report to be submitted within a month of completion of audit</p>	AMC and GUDM
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence; Insurance, Corrective Actions and Status of its implementation</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within one month after learning of the incident or accident.</p>	AMC and GUDM
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance to AMC in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the World Bank.</p>	Submit the monthly reports to the World Bank as annexes to the reports to be submitted under action A above.	AMC

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU in AMC with qualified staff and resources to support management of ESHS risks and impacts of the Project including one Environmental Specialist, one Environmental Engineer specialized in Sewerage and Drainage works with expertise and experience on Occupational and Community Health and Safety, one Social development and Resettlement Specialist, and one Stakeholder Engagement and Gender Specialist.</p> <p>Nominate/recruit one environmental specialist and one social specialist in GUDM</p> <p>Engage a qualified Project Management Consultant (PMC) to support AMC PIU with sufficient E&S staffing (as in ESMF) and engage a qualified RAP implementation consultant.</p> <p>AMC to include in bid documents that each contractor (including DBOT contractors) will be required to have qualified and experienced (as per ToR in ESMF) Environmental Specialist, Environmental Engineer with qualification and experience in Occupational and Community Health and Safety, Heritage Specialist, Biodiversity Management Specialist, and Social Development Specialist on its payroll and ensure that these specialists remain engaged throughout the project period</p>	<p>Establish and maintain a PIU at AMC as set out in the Loan Agreement. Recruit all required staff by Project appraisal completion, and thereafter maintain these positions throughout Project implementation.</p> <p>Nominate/recruit required staff by Project appraisal completion, and thereafter maintain these positions throughout Project implementation.</p> <p>Within one month of signing legal agreements</p> <p>The specialists will need to be included as essential manpower in the Bid Documents and in the bid submitted by the contractors including DBOT contractors and they will start working no later than 30 days after contract signing between AMC and the contractors or issue of Letter of Intent by AMC to start the works to the contractor; whichever is earlier.</p>	<p>AMC</p> <p>GUDM</p> <p>AMC</p> <p>AMC</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare and disclose the Environmental and Social Management Framework (ESMF) consistent with the relevant ESSs.</p> <p>Prepare and disclose updated ESIA for subprojects on STP rehabilitation and / or new construction (Vasna 240 MLD STP and Vasna 350 MLD STP) based on Feasibility Reports</p>	<p>Adopt the ESMF prior to Project appraisal, and thereafter implement the ESMF throughout Project implementation.</p>	<p>AMC and GUDM</p> <p>AMC</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>to initiate DBOT Contract procurement which will be implemented initially following ESMF procedures. These shall be updated as per the Detailed Designs when prepared by DBOT contractor during implementation stage.</p> <p>Prepare, get approved, disclose, update ESIA for all subprojects and technical Assistance activities following ESMF procedures.</p> <p>Cause DBOT contractors to adopt, update and implement the subproject-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) based on final detailed design, as set out in the ESMF and ESIA.</p>	<p>Preparation of ESIA to be coterminous with Feasibility Studies. Finalization, Approval and Disclosure updated ESIA and ESMP based on detailed designs shall be completed before issue of bid documents to the contractors. To be updated by the DBOT contractor prior to start of works</p> <p>Preparation of ESIA to be coterminous with detailed design of investments by DBOT contractors, Consultants. These should be prepared and approved as per ESMF prior to initiating any work on site. Once adopted, implement the respective ESMP throughout sub-project implementation.</p>	<p>AMC</p> <p>AMC</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, ESMS, ESIA, ESMPs, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts</p> <p>Bidding documents and contracts to include relevant measures of the ESMP</p>	<p>Prior to issuance of Expression of Interest (EOI) notice for contractors</p>	<p>AMC</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Preparation of Contractors-ESMP that will include Cultural Heritage Management Plan and Biodiversity Management Plan where applicable, Waste Management Plan, OHS Plan, SEA/SH Action Plan, Community Health and Safety Plan, Labor Management Plan, Traffic Management Plan, Waste Management Plan, Workers’ Camp Management Plan, etc. that will be acceptable to AMC, and the World Bank	During Bid document preparation One month prior to site mobilization	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project including, inter alia TA sub-components under components 1 and 3 are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference. GUDM will apply the provisions of ESMF, RPF and other instruments for TA activities as relevant.	Throughout Project implementation. Throughout Project implementation.	AMC and GUDM
1.6	ASSOCIATED FACILITIES Identify “Associated Facilities” as per ESF by screening of all sub-projects, as part of subproject ESIA and management/mitigation measures shall be proposed in ESMP. Ensure that all Associated Facilities meet the requirements of the ESSs, to the extent that AMC has control or influence over such Associated Facilities. In cases where the requirements of the ESSs cannot be followed, the Bank will require AMC to demonstrate the extent to which it cannot exercise control or influence over the Associated Facilities by providing details of the relevant considerations, which may include legal, regulatory and institutional factors. The Bank team will review each case and make a final decision based on available facts and information.	Throughout Project implementation	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES	Prepare, adopt and disclose the LMP prior to appraisal, and thereafter implement the LMP throughout Project implementation.	AMC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.		
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2 and with prevailing national and state labor laws and specific legislations on construction workers. The GRM will be responsive to SEA/SH complaints.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	AMC
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the LMP. Contractors EHS person shall have qualification in Life & Fire Safety, and prepare L&FS plan and implement the same Monitor and Supervise OHS at all sites Conduct OHS Audit and implement suggested actions to improve work safety	OHS plan will be prepared by contractor prior to site mobilization and implemented during civil works For all contracts, throughout implementation Monitoring and Supervision during civil works (pre-construction, construction and operation stages) as an integral part of construction supervision and quality assurance OHS Audit should be minimum one, annually	AMC and GUDM
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Hazardous and non-hazardous waste management plan: Contractor ESMP to include hazardous and non-hazardous waste management guidelines to handle material at site. Construction waste, debris, sludge, screened materials, and other waste disposal: disposal site management and restoration plan: Contractor ESMP to include construction	Throughout project implementation: pre-planning / preconstruction, construction, and operation stages	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	waste and other waste disposal site management and restoration plan including allocated budget to implement the plan.		
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Monitor all emissions / discharges / disposal of wastes from project facilities during construction and operation stages and ensure that the discharges from project facilities into the environment are as per latest limits suggested by MoEFCC, GPCB, and National Green Tribunal (which is stringent than WB-EHS (W&S) suggested Standards – the General Discharge Standards for Disposal of Treated Effluents to Surface Water and/or Irrigation under Environmental Protection Act 1986) whichever is stringent. The technology shall be upgraded to meet the directions of GPCB in the consent orders.</p> <p>In case of disposal of treated effluent for Irrigation through Fatehwadi Canal, AMC shall renew the Consent from GPCB to permit the same. Discharge shall be initiated only in line with the requirements laid out in GPCBs latest Guidelines on Discharge of Treated Effluents for Irrigation (2019): including Conducting a Study on impact (impact on soil, crops, communities) of use of such discharge for irrigation through an Agricultural University, arriving at additional standards, preparing Irrigation Management Plan for the command area, through stakeholder consultations.</p> <p>Ensure that pollution from project facilities do not negatively impact the environmental components and communities downstream. Undertake annual Pollution audit along with E&S Audit and confirm this.</p> <p>Efficient use water and other resources: Contractor ESMP to include project’s ‘specific water use and water conservation plan and other resource source and use and conservation plan. Contractor will ensure that resource required for civil works is not sourced from unauthorized sources.</p> <p>Construction material sourcing plan: Prepare, adopt, and implement construction material sourcing plan as a part of the ESMP</p> <p>Environmental monitoring: Contractor to monitor and ensure continuously and as required by consent conditions or any regulation or guidance; quality of treated sewage and drainage discharged from each facility or recycled and reused</p>	<p>Throughout project implementation: pre-planning / preconstruction, construction, and operation stages</p> <p>AMC, before letting out treated sewage through Fatehwadi Canal or any other canal, for irrigation / other purposes</p> <p>Throughout project implementation: pre-planning / preconstruction, construction, and operation stages</p> <p>Preparation of plan prior to contractors’ mobilization and monitored throughout the project implementation period</p>	AMC and GUDM
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Prepare, adopt and implement a Traffic Management Plan</p>	Same timeframe as for the adoption and implementation of the ESMP.	AMC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, air, noise and dust pollution, disposal of untreated sludges from the STPs, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMP.	AMC
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a SEA/SH action and/or related measures as part of the ESMP, to manage the risks of SEA and SH.</p>	Same timeframe as for the adoption and implementation of the ESMP.	AMC and GUDM
4.4	<p>DAM SAFETY</p> <p>Undertake hydrological and flood assessment, including a dam break analysis & flooding simulation, preparation of inundation maps and emergency action plan for Vasna barrage, Ahmedabad, prior to the design of the investments (STPs) and associated structures</p> <ul style="list-style-type: none"> • Outcome/output of this assessment shall be incorporated in the design of all STPs which might be impacted and subsequently assessed in C-ESIA & mitigation measures if required included in C-ESMP. Emergency Preparedness and Response Plan and Disaster Management Plan shall be part of all ESIA's 	<p>Before finalizing the design of STP construction / rehabilitation / upgrading works</p> <p>Implement dam safety assessment recommendations and Emergency Action Plan throughout project implementation.</p>	AMC
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Prepare, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Prepare and adopt the RPF prior to appraisal, and thereafter implement the RPF throughout Project implementation.	AMC
5.2	<p>RESETTLEMENT PLANS</p> <p>Prepare, disclose and implement Resettlement Action Plan (RAP) including a Livelihood Restoration Plan (LRP) if required based on site specific ESIA's.</p>	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided Prior to commencement of civil work at the STP sites and each identified section of the sewerage network	AMC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.3	<p>GRIEVANCE MECHANISM</p> <p>All land and resettlement related complaints will be addressed by the Project GRM as described in section 10.2</p>	Establish the grievance mechanism prior to commencement of project activities, and thereafter maintain and operate the mechanism throughout Project implementation	AMC
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Prepare, adopt and implement a Biodiversity Management Plan for subprojects which might have impacts or risks on biodiversity</p>	To be prepared as part of ESIA and implemented and monitored during project period	AMC
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Prepare, adopt and implement a Cultural Heritage Management Plan (CHMP) consistent with ESS8.</p>	Adopt and disclose the CHMP prior to appraisal, and thereafter implement the CHMP throughout Project implementation.	AMC
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF and CHMP of the Project.</p>	Describe the chance find procedures in the ESMF and CHMP. Implement the procedures throughout Project implementation.	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt the SEP prior to appraisal, and thereafter implement the SEP throughout Project implementation.]	AMC and GUDM
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p>	Establish the grievance mechanism prior to commencement of project activities, and thereafter maintain and operate the mechanism throughout Project implementation	AMC and GUDM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
CAPACITY SUPPORT			
CS1	<p>Based on E&S Capacity Assessment (as described in the ESMF), following types of training will be provided to the relevant target groups, such as PIU staff, PMC, stakeholder community, project workers, consultants, contractors, sub-contractors</p> <ul style="list-style-type: none"> • Orientation training to staff of PIUs (AMC and GUDM) on the World Bank ESF, G-ACRP ESMF, and its implementation modality (screening, scoping etc.) • Training to AMC PIU, GUDM PIU, PMC staff on: <ul style="list-style-type: none"> ▪ Issues of Land acquisition and involuntary resettlement, ▪ Issues of vulnerable and disadvantaged people, ▪ ESIA and RAP, ▪ Occupational health and safety, community health and safety, ▪ Labor practices, ▪ Cultural heritage management, ▪ Biodiversity Management ▪ Disaster Management specially Flooding & Earthquakes, ▪ Traffic and road safety, ▪ Consultant Procurement and Contract Management including Guidelines on environmental and social conditions in the BOQ/contract documents, and ▪ Implementation of ESMP ▪ Management of Construction Impacts ▪ Construction Supervision and audit ▪ SEA/SH prevention and response 	During Project implementation	AMC and GUDM
CS2	Provide training for Project workers on occupational health and safety including on disaster prevention and emergency preparedness and response	Throughout the project implementation period	AMC