



# **Environmental and Social Impact Assessment for a 61.0 MWp / 47.5 MWac Solar Power Project in Sulekal and Benkanhal Villages, Kanakagiri Taluk, District Koppal, Karnataka**

Ampyr Renewable Energy  
Resources Eleven Pvt. Ltd.

Final Report

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## CONTENTS

<b>1. INTRODUCTION .....</b>	<b>1</b>
1.1 Layout of this Volume .....	1
<b>2. STAKEHOLDER ENGAGEMENT PLAN – GRIEVANCE REDRESSAL MECHANISM .....</b>	<b>2</b>
2.1 Objective and Scope of SEP-GRM .....	2
2.1.1 Scope.....	2
2.2 Stakeholder Identification and Categorization.....	3
2.2.1 Methodology for Stakeholder Analysis.....	4
2.2.2 Stakeholder Analysis and Influence .....	4
2.2.3 Stakeholder Analysis .....	5
2.2.4 Detailed Engagement Plan .....	21
2.2.5 Information Disclosure .....	26
2.3 Grievance Redressal Mechanism .....	26
2.3.1 Grievance Redressal Process for External Grievances .....	27
2.3.2 Handling of Other Grievances.....	29
2.3.3 Monitoring, Reporting and Reviewing the Procedure.....	30
2.4 Institutional Set-Up .....	30
2.4.1 Training.....	31
2.4.2 Reporting .....	32

## APPENDIX A GRIEVANCE REDRESSAL FORM

### List of Tables

Table 2.1 Stakeholder Group Categorization.....	3
Table 2.2 Stakeholder Impact Matrix .....	4
Table 2.3 Stakeholder Analysis .....	6
Table 2.4 Detailed Stakeholder Engagement Plan .....	21
Table 2.5 Grievance Register Format.....	28
Table 2.6 Roles and Responsibility for GRM Implementation .....	31
Table 2.7 Format for Reporting on Stakeholder Engagement on Site.....	32

### List of Figures

Figure 2.1 Stages in Grievance Redressal .....	27
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### Acronyms and Abbreviations

Name	Description
CFM	Climate Fund Managers
ESIA	Environment and Social Impact Assessment
SPV	Special Purpose Vehicle
RIC	Responsible Investment Code
SEP	Stakeholder Engagement Plan
GRM	Grievance Redressal Mechanism

<b>Name</b>	<b>Description</b>
ESMP	Environment and Social Management Plan
O&M	Operations and Maintenance
NGO	Non-Governmental Organization
ASHA	Accredited Social Health Activist
EPC	Engineering, Procurement, and Construction
HT	High Tension
SC	Scheduled Caste
ST	Scheduled Tribe
MGNREGA	Mahatma Gandhi National Rural Employment Guarantee Act
GP	Gram Panchayat
NOC	Non-Objection Certificate
Ha	Hectare
KERC	Karnataka Electricity Regulation Commission
KREDL	Karnataka Renewable Energy Development Agency
KSPCB	Karnataka State Pollution Control Board
GESCOM	Gulbarga Electricity Supply Company Limited
IREDA	International Renewable Energy Agency
GSS	Grid Sub-Station
KPTCL	Karnataka Power Transmission Corporation Limited
WEDS	Women and Environment Development Society
FGD	Focus Group Discussion
HIV	Human Immunodeficiency Virus
AIDS	Acquired Immunodeficiency Syndrome
STD	Sexually Transmitted Disease
WHO	World Health Organization
E&S	Environment and Social
POSH	Prevention of Sexual Harassment at Workplace

## 1. INTRODUCTION

Ampyr Renewable Energy Resources Eleven Pvt. Ltd. and Climate Fund Managers (CFM) (*hereinafter referred to as 'Client' or Ampyr and CFM*) commissioned ERM India Private Limited (*hereinafter referred to as 'ERM'*) to undertake an Environmental and Social Impact Assessment (ESIA) study for a proposed 61.0 MWp / 47.5 MWac Solar Power Project in Villages Sulekal and Benkanhal, Taluk Kanakagiri and District Koppal in Karnataka, India (*hereinafter referred to as 'Project'*). Ampyr Renewable Energy Resources Eleven Pvt. Ltd is a special purpose vehicle (SPV) formed in 2021 for implementation of the current Project. The ESIA has been divided into six volumes namely:

- Volume 1: Non-technical Summary
- Volume 2: Introduction and Project Context
- Volume 3: Environmental and Social Baseline
- Volume 4: Environmental and Social Impact Assessment
- Volume 5: Environmental and Social Management Plan
- Volume 6 (*this volume*): Stakeholder Engagement Plan and Grievance Redressal Management

As part of the Project, Stakeholder Engagement Plan and Grievance Redressal Mechanism has been identified in the proposal (dated 4 May 2022) and agreed between Ampyr, CFM, and ERM during the initial review of the E&S Scoping Report. The requirement to undertake a SEP-GRM has been identified at the proposal stage to comply with CFM's Responsible Investment Code (RIC). The SEP-GRM elaborates on the SEP developed as part of the ESIA (Volume 3) and will incorporate the stakeholder identification, characterization, mapping and analysis exercise that can be followed by Ampyr after implementation of the ESIA across the Project life cycle. The SEP-GRM includes a post-ESIA engagement monitoring and reporting.

### 1.1 Layout of this Volume

The aforementioned Stakeholder Engagement Plan – Grievance Redressal Mechanism have been provided in accordance with the following layout:

<i>Section 1 (this section)</i>	Introduction
<i>Section 2</i>	Stakeholder Engagement Plan – Grievance Redressal Mechanism (SEP-GRM)
<i>Appendix A</i>	Grievance Redressal Form

## 2. STAKEHOLDER ENGAGEMENT PLAN – GRIEVANCE REDRESSAL MECHANISM

This section presents the Stakeholder Engagement Plan (SEP) and Grievance Redressal Mechanism (GRM), which are applicable for the entire project lifecycle. The main objective of this plan is to guide stakeholder engagement and grievance redress process across various stages of the Project, while meeting the requirements of the applicable reference framework for the Project. Overall, the SEP will enable stakeholder engagement to be undertaken in a systematic manner, where a designated resource “E&S Manager” will implement specific measures to enable the various stakeholder groups to express their individual views, opinions and concerns, grievances, etc., while allowing the Project to appropriately respond to them.

### 2.1 Objective and Scope of SEP-GRM

The objective of the Stakeholder Engagement Plan (SEP) are as follows:

- Identification of the stakeholder groups of the Project location and analysis of their profiles, interests, issues/impacts and concerns relevant to the Project;
- Identification of specific measures to allow meaningful engagement with different stakeholder groups identified in a manner that is transparent and accessible and using culturally appropriate communication methods with a specific focus on the stakeholders with high influence/impact;
- Facilitate adequate and timely dissemination of information to the stakeholder groups in a culturally appropriate manner;
- Provide mechanisms for prior disclosure/dissemination of information and consultation including seeking inputs from affected persons, incorporation of inputs, as applicable, providing feedback to affected persons/groups on whether and how the input has been incorporated; and
- Providing a mechanism for documentation of the activities undertaken and the reporting and monitoring of the same

The objectives of the external Grievance Redressal Mechanism (GRM) are as follows:

- To provide formal, systematic and a confidential platform for registration and addressal of grievances;
- To understand the problems of the stakeholders and resolve the issues amicably in order to maintain a culture of sustainable performance;
- To settle grievances in a time-bound manner;
- To provide a mechanism for speedy redressal of grievance and complaints;
- To provide transparency, fairness, and accountability to the stakeholders; and
- To develop and maintain positive relations between the Project and its stakeholders.

#### 2.1.1 Scope

The SEP and GRM apply to the entire project lifecycle, which is a part of a larger Environmental and Social Management Plan (ESMP), and is a live document, to be updated regularly based on the emerging needs and patterns for engagement across various identified stakeholders. The following phases of the project cycle are covered:

- **Planning Phase:** The planning phase includes land procurement, transfer and lease allotment among other activities such as site surveys and assessments.
- **Construction Phase:** The construction phase includes site preparation such as contractor mobilisation, erection of fencing or barriers, construction of site compound and storage areas,

upgradation and construction of internal roads including site clearance, foundation laying for ground mounted structures, construction of sub-station and office buildings, installation of inverters and transformers, excavation foundation and erection of transmission line towers, stringing of transmission lines and completion of internal electric connections.

- **Operation & Maintenance Phase:** The Operation and Maintenance (O&M) phase include regular cleaning of the PV modules, control of vegetation (grass cutting), routine inspection of all PV modules and associated structures, O&M of ancillary facilities such as the power sub-station, inspection and maintenance of transmission lines and internal road repairs as and when required.
- **Decommissioning Phase:** The average life span of the solar modules is 25 years from the date of commissioning. This depends on the quality of periodic maintenance of the solar modules as well as supporting infrastructure. The decommissioning activities will include the solar modules to either be revamped or replaced or disposed as per the applicable legislation at that point of time. Restoration of the site to the pre-construction stage.

The employees, workers (including contractual workers) and contractors engaged for the project are the “Internal Stakeholders” for the project, while nearby community, various Government departments, regulatory authorities, other nearby projects and facilities will be addressed as “External Stakeholders” of the project. The GRM is applicable to both internal and external stakeholders of the project.

## 2.2 Stakeholder Identification and Categorization

### Who is a Stakeholder? – Definition

*“Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.”<sup>1</sup>*

Stakeholders vary in terms of degree of interest, influence and control they have over the project. While those stakeholders who have a direct impact on or are directly impacted by the project are known as ‘**Primary Stakeholders**’, those who have an indirect impact or are indirectly impacted are known as ‘**Secondary Stakeholders**’. Keeping in mind the nature of the project and its setting, the stakeholders have been identified and listed in the table given below:

**Table 2.1 Stakeholder Group Categorization**

Stakeholder Group	Primary Stakeholders	Secondary Stakeholders
Community	<ul style="list-style-type: none"> <li>■ Land sellers from Sulekal and Benkanhal</li> <li>■ Land Aggregator, Local Land Agents, Developers, Contractors</li> <li>■ Local Labourers, female workers and labourers</li> </ul>	<ul style="list-style-type: none"> <li>■ Local Community</li> <li>■ Vulnerable Social Groups</li> </ul>
Institutional Stakeholders	<ul style="list-style-type: none"> <li>■ Gram Panchayat – Sulekal</li> <li>■ Government School Teachers</li> </ul>	<ul style="list-style-type: none"> <li>■ Civil Society/ NGOs</li> </ul>

<sup>1</sup> Stakeholder Engagement: A Good practice Handbook for Companies Doing Business in Emerging Markets. International Finance Corporation (IFC).

[https://www.ifc.org/wps/wcm/connect/affbc005-2569-4e58-9962-280c483baa12/IFC\\_StakeholderEngagement.pdf?MOD=AJPERES&CVID=jkD13-p](https://www.ifc.org/wps/wcm/connect/affbc005-2569-4e58-9962-280c483baa12/IFC_StakeholderEngagement.pdf?MOD=AJPERES&CVID=jkD13-p) [Accessed on 24.08.2020]



Stakeholder Group	Primary Stakeholders	Secondary Stakeholders
	<ul style="list-style-type: none"> <li>■ ASHA Workers</li> </ul>	
Government Bodies	<ul style="list-style-type: none"> <li>■ Government/Substation Authorities</li> <li>■ District and Taluka Administration</li> </ul>	
Other Groups	<ul style="list-style-type: none"> <li>■ Employees</li> <li>■ EPC and O&amp;M Contractors</li> <li>■ Contractual Labourers (non-local)</li> </ul>	<ul style="list-style-type: none"> <li>■ Solar panels and equipment suppliers</li> </ul>

### 2.2.1 Methodology for Stakeholder Analysis

The significance of a stakeholder group is categorized considering the magnitude of impact (type, extent, duration, scale and frequency) or degree of influence (power and proximity) of a stakeholder group and urgency/ likelihood of the impact/ influence associated with the particular stakeholder group in the project context. The magnitude of stakeholder impact/influence is assessed by taking the power/ responsibility and proximity of the stakeholder group. The group is consequently categorized as negligible, small, medium or large. The urgency/ likelihood of the impact on/influence of the stakeholder is assessed on a scale of low, medium and high. The overall significance of the stakeholder group is assessed as per the matrix shown below:

**Table 2.2 Stakeholder Impact Matrix**

		Likelihood of Influence on/by Stakeholder		
		Low	Medium	High
<b>Magnitude of Influence/ Impact</b>	<b>Negligible</b>	Negligible	Negligible	Negligible
	<b>Small</b>	Negligible	Minor	Moderate
	<b>Medium</b>	Minor	Moderate	Urgent
	<b>Large</b>	Moderate	Urgent	Urgent

### 2.2.2 Stakeholder Analysis and Influence

The table below has been used to classify the identified stakeholders (directly or indirectly impacting the project) in accordance with their levels of influence on the project. The influence and priority have both been primarily rated as:

- **High Influence:** This implies a high degree of influence of the stakeholder on the project in terms of participation and decision making or high priority to engage with the stakeholder;
- **Medium Influence:** Which implies a moderate level of influence and participation of the stakeholder in the project as well as a priority level to engage the stakeholder which is neither highly critical nor are insignificant in terms of influence; and
- **Low Influence:** This implies a low degree of influence of the stakeholder on the project in terms of participation and decision making or low priority to engage that stakeholder.

The intermediary categories of low to medium or medium to high primarily imply that their influence and importance could vary in that particular range subject to context specific conditions or also based on the responses of the project towards the community.

The coverage of stakeholders as stated above includes any person, group, institution or organization that is likely to be impacted (directly or indirectly) or may have interest/influence over project. Keeping this wide scope of inclusion in stakeholder category and the long life of project, it is difficult to identify all potential stakeholders and gauge their level of influence over project at the outset of the project. Therefore, the project proponent is advised to consider this stakeholder mapping as a live document which should be revised in a timely manner so as to make it comprehensive for any given period of time.

### **2.2.3 Stakeholder Analysis**

The following table (**Table 2.3**) presents the key issues identified during the discussion with the various stakeholders as well as the proposed mitigation measures:



**Table 2.3 Stakeholder Analysis**

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
<b>Primary Stakeholders</b>					
Land Owners	<ul style="list-style-type: none"> <li>■ As per the consultations, the land leased for the project is private agriculture land, most of which has been used for agriculture. There is no Gram Sabha/Government land identified as part of the project area. The total land requirement for the project is estimated to be ~94 hectares.</li> <li>■ It was reported by the land aggregator and the land team that there are 55 landowners in total from Sulekal and Benkanhal villages that are going to lease land for the Project. During the time of ESIA visit, ERM team conducted a preliminary household survey of 24 landowners out of 55.</li> </ul>	<ul style="list-style-type: none"> <li>■ Constituting the most critical stakeholder group, the land owners make up the portion of the local community to have benefitted/impacted from the Project. There are two projects (both solar) currently operational in the study area. This is not the first time the local community (from Sulekal and Benkanhal) has had to lease land for a renewable energy Project.</li> <li>■ It was understood during consultations that the farmers are willing to sell their land due to the low productivity of the agricultural land.</li> <li>■ Consultations indicated that most landowners have planned to repay the agricultural loans, invest in some business with the amount received after leasing the land along with managing other household expenses such as wedding, house construction.</li> <li>■ It was reported that the landowners are going to receive payment at the rate of INR 30,000 per acre per year.</li> </ul>	<ul style="list-style-type: none"> <li>■ The stakeholder groups' influence on the project pertains to the smooth functioning of the project and the timely completion of the project activities.</li> <li>■ As any deficiency in planning and mitigating the impacts of the project on them may result in the creation of adverse opinion against the project.</li> <li>■ Local people, especially those who will lease their land have an expectation in the form of direct and indirect employment both during the construction as well as operation phases.</li> </ul>	<ul style="list-style-type: none"> <li>■ The consultation and survey which was held with the stakeholder group indicates that their major concern is related to the availability of employment opportunities that the project will generate</li> <li>■ Preference to be given to those who will lease their land for the project in order to give the skill development training which shall enhance their source of income and their skills</li> <li>■ Preferences to this stakeholder group in allotment of work contract for construction activities.</li> <li>■ Preference among any vulnerable or differentially impacted categories of land owners such as marginal land owner who is left with smaller land holdings and women landowners.</li> </ul>	<b>Medium</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
Land Users <sup>2</sup>	<ul style="list-style-type: none"> <li>■ Based on the survey, there are 8 landowners who have share-croppers working on the land they are leasing. It was reported that all the sharecroppers out of 8 have alternate land which they are accessing as sharecroppers. During the survey it was reported that landowners hired between 10 – 15 agricultural labourers depending on the requirement.</li> <li>■ It was also reported during the consultations with landowners and the local communities in the Core Zone that the area has a shortage of sharecroppers and agricultural labourers.</li> <li>■ The average wages for agricultural labour varied from INR 200 – 250 for women and INR 300 – 400 for men.</li> </ul>	<ul style="list-style-type: none"> <li>■ Based on the survey, there are 8 landowners who have share-croppers working on the land they are leasing. It was reported that all 8 sharecroppers have alternate land which they are accessing as sharecroppers.</li> <li>■ It was reported that the area had a shortage of agricultural labour and farmers have to get labourers from the nearby villages for which they pay for the transportation.</li> <li>■ Although there are opportunities available for these non-title holders to work on other farms in the same village or nearby villages, it is to be noted that after the land is leased by the Project, the transition process until they find a new opportunity should be taken into account.</li> <li>■ This will temporarily have impacted their income as the land users will be economically displaced from the land parcels they're working on. It may also impact their financial capability to invest in agricultural inputs on the land they will work on after the current land is leased.</li> </ul>	<ul style="list-style-type: none"> <li>■ The influence of this group on project activities is limited since they do not have any legal rights on the land.</li> </ul>	<ul style="list-style-type: none"> <li>■ The main expectation would be to find opportunities in the construction phase of the project in addition to current source of livelihood</li> <li>■ It was understood during the consultations with the landowners and local land agents that non-title holders were not consulted by the Project.</li> <li>■ The economic displacement of the sharecroppers and agricultural labourers is understood to be involuntary in nature.</li> </ul>	<b>Low</b>

<sup>2</sup> Land users include sharecroppers and agricultural labourers currently working on the land that the Project is going to lease/

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
Land Aggregator	<ul style="list-style-type: none"> <li>■ Sunbreeze Renewables has been contracted for land lease process</li> </ul>	<ul style="list-style-type: none"> <li>■ The land aggregator is bound by the Development Service Agreement and Ampyr’s sub-contractor policies and procedures (as annexed in the Development Service Agreement). Therefore, Sunbreeze Renewables is bound to lease land following all the terms and conditions as outlined in the contract agreement.</li> </ul>	<ul style="list-style-type: none"> <li>■ The land aggregator has a significant influence on the project as it facilitates land lease process by way of communication, executes the terms and conditions of a lease deed as well as determining the willingness of landowners to lease the land.</li> <li>■ The land aggregator is project’s representative and is responsible for building a relationship with the community before the construction phase.</li> <li>■ For example: if the land aggregator transfers the ownership of land with pending litigations or encumbrances or makes false promises to landowners or the local community, then Ampyr (and/or its SPV) shall become a responsible party to the act.</li> <li>■ Potential impacts on the Project may arise from the following: non-</li> </ul>	<ul style="list-style-type: none"> <li>■ Furthermore, if any of the aforesaid issues raised at the site, the land aggregator is expected to adhere to the GRM and SEP that Ampyr is recommended to establish in the said volume (Volume 6. SEP-GRM) for the said Project. For the smooth operation of the project.</li> </ul>	<p><b>Medium</b></p>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
			compliance to the legal requirements, not meeting the community expectations, and leaving behind a legacy of conflict-ridden relationship with local communities.		
Developers and EPC Contractors	<ul style="list-style-type: none"> <li>An Erection, Procurement and Construction (EPC) contractor is yet to be finalized by Ampyr for the project. Broadly scope of services of EPC contractor includes design, engineering, manufacture, supply, erection, testing and commissioning of the solar PV technology solar power plant with associated 33kV HT underground cable up to the pooling station on turnkey basis.</li> </ul>	<ul style="list-style-type: none"> <li>The key aspects in which the project can have an impact on this stakeholder groups are by making timely payments for project work completed and ensuring the implementation of safeguards for employees.</li> <li>The EPC contractor will also be responsible for implementing the ESMP and will have to be trained and monitored.</li> </ul>	<ul style="list-style-type: none"> <li>Although an EPC contractor has not been appointed, this stakeholder will impact the project through the smooth operation of the construction activities and to complete the work within the scheduled time and cost.</li> <li>Potential impacts on the Project may arise from the following: non-compliance to the legal requirements, not meeting the community expectations, and leaving behind a legacy of conflict-ridden relationship with local communities.</li> </ul>	<ul style="list-style-type: none"> <li>The main expectation of this stakeholder group is the timely commissioning of the project with quality construction and stipulated budgetary provisions.</li> </ul>	<b>High</b>
Local Labourers	<ul style="list-style-type: none"> <li>The study area has adequate availability</li> </ul>	<ul style="list-style-type: none"> <li>The Project activities will involve a workforce of approximately 250</li> </ul>	<ul style="list-style-type: none"> <li>Engaging this stakeholder group with the project as</li> </ul>	<ul style="list-style-type: none"> <li>The major concerns of this stakeholder group include:</li> </ul>	<b>Medium</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>agricultural labourers. Due to the lack of other projects and industries in the study area, the available local labour is unskilled.</p> <ul style="list-style-type: none"> <li>■ Consultations with the local community indicated the prevalence of unemployment, the lack of opportunities and expectations from the project for the same.</li> </ul>	<p>employees, skilled and unskilled workers during the construction phase and 80 workers during the operations phase.</p> <ul style="list-style-type: none"> <li>■ It is envisaged that the employment opportunities generated during the construction period will attract local workers.</li> <li>■ The locally available labourers will suffice for the construction and operations phase, after providing preferential employment opportunities for land owners' families.</li> </ul>	<p>a preference over migrant workers will help create a good reputation of the project in the study area.</p> <ul style="list-style-type: none"> <li>■ Any labour unrest and protests may cause delays in construction schedule and create a non-congenial social atmosphere; consequently, delay in construction activities will have financial implications on the project.</li> </ul>	<ul style="list-style-type: none"> <li>- Regular payment of wages for the work rendered;</li> <li>- Continued employment even beyond the completion of construction work;</li> <li>- Health and Safety issues at work; and</li> <li>- Holidays and leaves as per labour laws applicable etc.</li> </ul>	
Female Workers and Labourers	<ul style="list-style-type: none"> <li>■ During the consultations with the school principals and teachers at government primary schools in Sulekal and Benkanhal, it was reported that all the girls in the villages study upto 8<sup>th</sup> class (age of 13-14 years). Beyond that, nearly 20% of the girls drop out and work on the farm with their families and the rest go to secondary and senior secondary school in Kanakagiri which is 5 km away. The major reason</li> </ul>	<p>The key impacts on women as stakeholders in the project have been identified as likely to be:</p> <ul style="list-style-type: none"> <li>■ Reduction in Landholding will directly affect the household economic condition and major responsibility of managing household in limited resources will fall upon women.</li> <li>■ The impact due to land lease process will affect women agricultural labourers and sharecroppers working on the land that is going to be leased by the project.</li> <li>■ Labour influx brings risks of health problems such as communicable diseases, harassment and violence, which can affect women significantly.</li> </ul>	<ul style="list-style-type: none"> <li>■ The women landowners' influence on the project pertains to the smooth functioning of the project and the timely completion of the project activities.</li> <li>■ As any deficiency in planning and mitigating the minor impacts of the project on them may result in the creation of adverse opinion against the project.</li> <li>■ Local women, especially those who will lease their land have an expectation in the form of direct and indirect employment both</li> </ul>	<p>The expectations of women workers include:</p> <ul style="list-style-type: none"> <li>■ The provision of safe working conditions for women, provision of safety gear and protective equipment to keep both men and women workers safe at work;</li> <li>■ Provision of toilet and sanitation facilities with reliable water supply and proper lock and lighting;</li> <li>■ Accessibility to the GRM; and</li> <li>■ The timely payment of applicable wages.</li> </ul>	<b>Low</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>pointed out for girls dropping out of school was the financial conditions of the households, not being able to travel far to attend secondary school, and lack of labourers or sharecroppers in the area to work on the farm.</p> <ul style="list-style-type: none"> <li>■ The opportunities for non-land based livelihood in the study area is significantly low, especially for women. Long term and short term migration to nearby cities and districts, construction work in the village, public project work such Mahatma Gandhi National Rural Employment Guarantee Act (MNREGA)<sup>3</sup>, and small businesses like local shops are some of the major sources of non-farm based livelihood options for people in the study</li> </ul>	<ul style="list-style-type: none"> <li>■ The impact due to economic opportunity is expected to affect women positively since it will create employment opportunities for men and women in local community.</li> <li>■ The impact due to land lease process will affect women agricultural labourers from ST community working on the land that is going to be leased by the project.</li> </ul>	<p>during the construction as well as operation phases.</p> <ul style="list-style-type: none"> <li>■ The influence of this group on project activities is limited in case of land users (sharecroppers and agricultural labourers) since they do not have any legal rights to the land leased.</li> </ul>		

<sup>3</sup> MNREGA is an Indian labour law and social security measure that aims to guarantee the 'right to work'. It aims to enhance livelihood security in rural areas by providing at least 100 days of wage employment in a financial year to every household whose adult members volunteer to do unskilled manual work



Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>area. The scope of employment of women in these sectors is significantly limited.</p> <ul style="list-style-type: none"> <li>■ It was reported that women in the study area work as agricultural labourers on their own farm but some of them go out seeking agricultural labour work in the nearby farms. The average wages for women agricultural labourer and daily wage labourers varied from INR 200 – 250.</li> </ul>				
Gram Panchayats	<ul style="list-style-type: none"> <li>■ The Gram Panchayats are the lowest strata of decentralized local governance in a country, a typical Panchayat consists of one or more revenue villages.</li> <li>■ This stakeholder group comprises of the Village Sarpanch and other members of the Gram Panchayat. They need to be actively involved in the various activities relating</li> </ul>	<ul style="list-style-type: none"> <li>■ The Gram panchayat might expect positive impact from the project in the following manner: <ul style="list-style-type: none"> <li>- Generation of employment opportunities at the local level.</li> <li>- Adequacy of the community development initiatives to be undertaken by the project; and</li> <li>- Timely and adequate disclosure of information throughout the life of the project.</li> </ul> </li> <li>■ The Gram Panchayat will be involved in the project obtaining permissions for water requirement, impacts of</li> </ul>	<ul style="list-style-type: none"> <li>■ Most of the rural development schemes and funds for central schemes are channelled through this body of governance. Also, it is the Panchayats who are bestowed with the decision-making authority for economic development and social justice. They also play a key role in the opinion formulation towards the project.</li> </ul>	<ul style="list-style-type: none"> <li>■ GPs play an important role in overall mobilization and shaping the perception and opinions of the people in the project area.</li> <li>■ They play a role even in demanding community development works for social welfare purpose as well as for the development of the villages by undertaking Community Development activities in collaboration with the Gram Panchayat, especially in areas where</li> </ul>	<b>Medium</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>to the economic development and social justice of their Panchayat. The smooth and hassle-free functioning of the project is within the Gram Panchayat's control.</p>	<p>localised community health and safety concerns during construction.</p>	<ul style="list-style-type: none"> <li>■ Gram Panchayats play a key role in the opinion formulation towards the project and in the smooth functioning of project activities (by granting permissions and approvals etc.)</li> </ul>	<p>there is a paucity of government funds</p> <ul style="list-style-type: none"> <li>■ NoC by GP will have certain expectations and list the project components that are allowed. Any use of resources, project expansion, change in project components, use of common infrastructure, etc. will need prior permission from them/need to inform them as good practice.</li> </ul>	
Migrant Workforce	<ul style="list-style-type: none"> <li>■ The nature of activities in the construction phase requires skilled and semi-skilled labourers for certain specific tasks which are not understood to be locally available; This group is most likely to be comprised of the workers involved in the foundation activities, access road construction and security for solar plant.</li> <li>■ If needed to bridge the skill gap, labourers skilled in specific tasks would be brought in by the contractors/ sub-</li> </ul>	<ul style="list-style-type: none"> <li>■ The project has an overall positive impact over the migrant workforce by generating employment opportunities</li> <li>■ It was reported that there will be one (1) labour accommodation for the migrant labours. Labour camp of 0.4 ha (1 acre) is taken on lease by EPC contractor adjacent to the Project boundary in the North.</li> </ul>	<ul style="list-style-type: none"> <li>■ Retaining the migrant workforce, especially during the construction phase of the project is extremely critical.</li> </ul>	<ul style="list-style-type: none"> <li>■ Migrant workers may see this as a better economic and livelihood opportunity for them; and</li> <li>■ The fluctuation of the supply of local labour in harvest and other agricultural peak seasons can be met by deployment of migrant workers</li> </ul>	<b>Low</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>contractors from other areas;</p> <ul style="list-style-type: none"> <li>■ However, the requirement of migrant workers and the plan for their accommodation is not known at this stage.</li> </ul>				
Regulatory Authorities	<ul style="list-style-type: none"> <li>■ This stakeholder group comprise of the central, state and district level regulatory authorities. These authorities influence the project in terms of establishing policy, granting permits and approvals for the project, monitoring and enforcing compliance with the applicable rules and regulations.</li> <li>■ The primary regulatory authorities of Karnataka are: -               <ul style="list-style-type: none"> <li>- The primary regulators for renewable energy projects are:</li> <li>- Karnataka Electricity Regulation Commission (KERC)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>■ The project should ensure the compliance with the relevant guidelines and policy recommendations as per the State Govt. Such as the Comprehensive Policy for Grid connected Power Projects based on New and Renewable (Non-conventional) Energy Sources – 2015.</li> <li>■ The influence of the project on this stakeholder group pertains to the role the project will play in the development of solar energy in Karnataka.</li> </ul>	<ul style="list-style-type: none"> <li>■ The failure of the project to comply with the various rules and regulations applicable is instrumental for the timely implementation of the project</li> </ul>	<ul style="list-style-type: none"> <li>■ The key expectations of the regulatory authorities is ensuring that the project proponent meets all the statutory compliances and that the project operations are undertaken as per the conditions put forth by the authorities and after having obtained all the necessary permits</li> </ul>	<b>High</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<ul style="list-style-type: none"> <li>- Karnataka Renewable Energy Development Agency (KREDL)</li> <li>- Karnataka State Pollution Control Board (KSPCB)</li> <li>- Gulbarga Electricity Supply Company Limited (GESCOM)</li> <li>- IREDA at the national level.</li> </ul>				
Karnataka Power Transmission Corporation Limited (KPTCL)	No additional infrastructure or modifications to the existing line will be required the power from the proposed solar plant will be evacuated to the KPTCL 220 kV GSS in Sulekal, Karnataka	The influence of the project on this stakeholder group pertains to the role the project will play in the development of solar energy in Karnataka	KPTCL plays a key role in the operation of the project. The failure in the compliance with the requirements/ conditions laid down by the stakeholder might delay the project and risk the reputation of the developer.	The expectation of this stakeholder is to follows and to be in compliance with the general and specific conditions set by KPTCL	<b>High</b>
Employees	<ul style="list-style-type: none"> <li>■ This stakeholder group comprises of the regular employees of Ampyr and its SPV who are to be involved in the various stages of the project.</li> </ul>	<ul style="list-style-type: none"> <li>■ The expectations of this stakeholder group in regard to the project pertain to the following:                             <ul style="list-style-type: none"> <li>■ Job security</li> <li>■ Safe working conditions</li> <li>■ Provision of rewards and recognitions for good performances and safe behaviour</li> <li>■ Proper work-life balance</li> <li>■ Ethical and professional conduct</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>■ The influence of these stakeholders pertains to the roles played by them in the overall smooth functioning of the project operations as well as the brand value;</li> <li>■ They will also play an important role in the maintenance and</li> </ul>	<ul style="list-style-type: none"> <li>■ The primary concern of the stakeholder group pertains to the role of the project in ensuring continued economic opportunities and work generation.</li> </ul>	<b>Low</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
		<ul style="list-style-type: none"> <li>■ Employee engagement within &amp; after working hours</li> <li>■ Regular updating of rules and regulations</li> <li>■ Facilitation and maintenance of everyday convenience in regard to facilities such as transport, seating, food, accommodation etc.</li> </ul>	improvement of services and facilities.		
Contractual Labourers	<ul style="list-style-type: none"> <li>■ This stakeholder group comprises of those workers who are to be engaged in the project on a contractual basis through the different phases of project lifecycle.</li> <li>■ These labourers will be primarily semi-skilled and unskilled workers. As reported by Ampyr they will preference to the local community.</li> </ul>	These stakeholder group's influence on the project pertains to their role in the smooth functioning of the project and the opinion formation towards the project.	<p>The primary concern of the stakeholder group pertaining to the project will be as following:</p> <ul style="list-style-type: none"> <li>■ the role of the project in continued economic opportunity, work generation and a source of income</li> </ul>	<p>The main expectations from the project will be:</p> <ul style="list-style-type: none"> <li>■ timely settlement of dues and payments in keeping with the legal requirements</li> <li>■ continued work opportunities</li> <li>■ safety at work the role of the project in continued economic opportunity, work generation and a source of income</li> </ul>	<b>Medium</b>
District/Taluk Administration	<ul style="list-style-type: none"> <li>■ The project area is administered at three levels by different Government Bodies: at the district level, at the block/Taluk level and at the Panchayat level in each village/or cluster of villages.</li> </ul>	<p>The primary concern of the stakeholder group can be:</p> <ul style="list-style-type: none"> <li>■ Project's compliance towards the regulatory requirement;</li> <li>■ Role played by the project in the development of the area.</li> </ul>	<ul style="list-style-type: none"> <li>■ These authorities not only serve as important points of contact for villagers or other party wanting to liaise with higher authorities but are also critical in obtaining permissions and support for the various project activities.</li> </ul>	<p>The main expectations of the stakeholders from the project might be:</p> <ul style="list-style-type: none"> <li>■ Compliance with the regulatory requirements and legal provisions specific to the project;</li> <li>■ Timely disclosure of information pertaining to the project activities; and</li> </ul>	<b>Low</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<ul style="list-style-type: none"> <li>In this context, local administration refers to the district level and block level administration comprising of the offices of the Taluk, District Magistrate Collectors, and Revenue officer etc. The sub-registrar of the revenue department is responsible for registration of sale of land, land mutation, updating of records of transfer of land.</li> </ul>			<ul style="list-style-type: none"> <li>Involvement in the formulation and implementation of the community development activities throughout the life of the project.</li> </ul>	
<b>Secondary Stakeholders</b>					
Local Community	<ul style="list-style-type: none"> <li>The stakeholder group comprising of local communities inhabiting the villages in the study area. The community in the study area practices rain-fed agriculture in the study area and engages in casual labour during the non-cropping season.</li> </ul>	<ul style="list-style-type: none"> <li>The project can play a critical role in the development of the community through economic opportunities and Community Development activities.</li> </ul>	<ul style="list-style-type: none"> <li>Community consultations indicated that the agricultural labourers also work as construction workers during the lean agricultural period.</li> <li>Although the consultations and external factors review did not suggest any community agitation or dissatisfaction regarding the Project or other projects in the past, the local community's support of the project and its activities is extremely</li> </ul>	<ul style="list-style-type: none"> <li>The key concern of this stakeholder group from the project is the generation of employment opportunities and the preference of the local community in contractor and employment opportunities. This stakeholder group also expects regular updates on project activities and opportunities from the same. Most importantly, this stakeholder group expects minimal disturbance to the community with respect to</li> </ul>	<b>Low</b>



Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
			<p>crucial to ensure smooth functioning of the project and meeting of the timelines for the project.</p>	<p>access, pollution and influx of migrant workers (if any).</p> <ul style="list-style-type: none"> <li>■ Other than employment opportunities and community health and safety, improved education and health infrastructure, entrepreneurial training opportunities for women, a community hall and improved access to sanitation facilities are the needs identified for the community needs assessment plan.</li> </ul>	
<p>Vulnerable Groups such as women headed households, SC and Landless households</p>	<ul style="list-style-type: none"> <li>■ This stakeholder group includes women headed households, SC households and the landless. These subdivisions are on the basis of the understanding of the possibility of differentiated impacts on the community on the basis of the economic and social status in the society.</li> <li>■ Community consultations in the Core Zone indicated that there are about 50 – 60 households (~10%)</li> </ul>	<p>In view of the poor social and economic conditions of the Vulnerable Communities, the project may have to provide engagement avenues for the group.</p>	<p>The influence of this stakeholder group in regard to the project pertains to the smooth functioning of the project and the opinion formation of the same. While due to the position of this group in the community, the level of influence towards the project is limited, the project can disproportionately influence this group.</p>	<p>The primary expectations of this stakeholder group from the project pertain to the following:</p> <ul style="list-style-type: none"> <li>■ Appropriate community development activities in keeping with the needs of the community;</li> <li>■ Involvement in the formulation of the community development activities and their implementation;</li> <li>■ Timely disclosure of information through the life of the project.</li> </ul>	<p><b>Low</b></p>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<p>that are landless in Sulekal, about 30 – 40 (~15%) households in Benkanhal, and 35 – 40 (~15%) households in Tippanhal. It was also reported that most of these households belonged to SC communities.</p>				
Equipment Suppliers	<ul style="list-style-type: none"> <li>■ Suppliers of equipment and more importantly solar modules will play an important role in the implementation of the project.</li> </ul>	<ul style="list-style-type: none"> <li>■ The project will inform the local/ non-local equipment suppliers of potential collaboration opportunities with the Developer.</li> <li>■ The project will have an impact on this stakeholder group to the extent that it will provide an enhanced brand reputation and better market advantage to the supplier by enforcing the improvement in compliance with legislations and increased efficiency due to security of supply.</li> </ul>	<ul style="list-style-type: none"> <li>■ This stakeholder group will impact the project in terms of reputational risks and in terms of operational hindrances due to any supply chain risks.</li> <li>■ These may include child labour/ forced labour, worker health and safety issues or even the significant conversion of natural and/ or critical habitats from primary suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>■ The primary interest of this stakeholder group is that they should be able to supply to the project at fair prices and that they are able to operate ethically and profitably.</li> </ul>	<b>Medium</b>
Civil Society/Local NGOs	<ul style="list-style-type: none"> <li>■ There are NGOs based in Koppal District focused on improving the livelihood of the rural communities by supporting the various facets of their social life;</li> </ul>	<ul style="list-style-type: none"> <li>■ The project might directly collaborate or indirectly extended support to any of the ongoing activities being carried out or initiate newer ones in the study area.</li> </ul>	<ul style="list-style-type: none"> <li>■ The stakeholder group often plays a significant role in representing the interests of the vulnerable sections and related socio-economic issues.</li> </ul>	<ul style="list-style-type: none"> <li>■ The opinion of this stakeholder group may vary depending on whether the project operations have had any negative or positive impact over the community.</li> </ul>	<b>Medium</b>

Stakeholder Group	Profile/Status	Impact/Influence of the project on this stakeholder group	Impact/Influence of the stakeholder group on the project	Expectations, Vulnerability and Key Concerns of the stakeholder group	Overall rating of Stakeholder Influence
	<ul style="list-style-type: none"> <li>■ Some of the NGOs based in Koppal are Gurukripa Handloom and Textile Department, Sri Guru Education and Welfare Society, Sarvodaya, Women and Environment Development Society (WEDS), Samuha, Vahini Development Society, and Sakhi Trust.</li> <li>■ However, there are no NGOs that are directly active in the study area villages.</li> </ul>	<ul style="list-style-type: none"> <li>■ The project will allocate a Development Fund which might be provided to gram panchayats for local area development.</li> </ul>	<ul style="list-style-type: none"> <li>■ On the other hand, the same group may also build community confidence through highlighting the positive impact of the project and the targeted support extended to the community through Community Development activities.</li> </ul>	<ul style="list-style-type: none"> <li>■ The expectations of this group shall be similar to that of the local community and vulnerable sections of the population.</li> </ul>	

## 2.2.4 Detailed Engagement Plan

**Table 2.4 Detailed Stakeholder Engagement Plan**

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
<b>Planning Phase</b>				
ESIA and Management Plans	Land Owners Local Community Gram Panchayat Vulnerable Groups	Disclosure of the ESIA and the technical management plans such as the Stakeholder Engagement Plan, Grievance Redressal Mechanism, Community Needs Assessment Plan, Gender Action Plan and any livelihood restoration plans that the project develops.	Once, post the completion of the ESIA and management plan development.	Village Level- Sulekal and Benkanhal
Information Disclosure	All stakeholders	Disclosure of information about construction progress in locally understood languages of Kannada, Hindi and English (in that order): <ul style="list-style-type: none"> <li>■ Press release to local media</li> <li>■ Pamphlets for distribution and made available at public places</li> <li>■ Information provided directly to villagers through village information meetings from where land is being sourced</li> <li>■ Update on project and district administration website.</li> <li>■ Installation of informational boards near construction sites and local crossings, which include: <ul style="list-style-type: none"> <li>- Schematic map of construction area;</li> <li>- Timeframe/timelines for construction completion;</li> <li>- Person/entity responsible for construction operations including contact details;</li> <li>- Information about available Grievance Redressal Mechanism (GRM).</li> </ul> </li> <li>■ Consultation meetings, which include Focus Group Discussions (FGDs) with each identified stakeholder to capture their inputs on the project.</li> </ul>	Prior to start of construction and as per demand or request from specific stakeholders.	Village Level- Sulekal and Benkanhal; and Project Site

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Information on Local Employment Opportunities	Land Owners Local labourers, female workers Gram Panchayat	<p>Engagement on local employment and contracting opportunities at a gram panchayat and district level closer to start of construction, including where any interested applications can be forwarded:</p> <ul style="list-style-type: none"> <li>- Information on local employment should be communicated to the Gram Panchayats and information on availability of employment opportunities should be displayed at the Gram Panchayat office (in the local language) in consultation with the Sarpanch</li> <li>- Public Meetings with land owners and female workers for preferential employment and if the worker requirements persist, the project shall undertake meetings with the local community and put out a notice in the local newspapers and advertise for the employment opportunities for the project in advance (by implementing the local contracting and procurement plan), through consultations with key persons in the community, pamphlets being pasted at critical community hotspots, like Bus Stops, Government hospitals, etc.;</li> </ul>	Prior to start of construction	Village Level- Sulekal and Benkanhal
Engage and inform local authorities with regard to traffic movement, undertaking health awareness in the local community and implementation of vector control programmes.	Gram Panchayat	<p>Local authorities should be:</p> <ul style="list-style-type: none"> <li>■ Engaged in the management of traffic flows and development of additional safety measures, if required.</li> <li>■ Informed about the influx of migrant workers, if applicable, and their duration of stay</li> </ul>	Prior to start of construction phase.	Office of authorities

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Consultations with local community on health and safety	Local community residing in Sulekal and Benkanhal	<p>Consultation with local community to understand their concerns, raise awareness of risks and opportunities and identify solutions for issues related to:</p> <ul style="list-style-type: none"> <li>■ If migrant workers are engaged, during construction phase, there is potential for adverse impacts linked to in-migration;</li> <li>■ Access disruption to roads;</li> <li>■ Noise disturbance;</li> <li>■ Other issues or grievances</li> </ul> <p>The local community should also be informed about the Grievance Redressal Mechanism (GRM) for the project.</p>	Prior to start of construction phase and as per local needs of the community, but not less than every three months.	Village Level-Sulekal and Benkanhal
Occupational Health & Safety	Contractors, sub-contractors and workers	Meetings and Toolbox talks to provide briefings on the tasks to be completed and the standards to be followed, for quality control and health and safety protection from potential hazards such as increased traffic, as well as dust and sand flying from carriers.	Daily during transportation activities.	Project site
<b>Construction Phase</b>				
Announcements and information related to construction activities	Local community in Sulekal and Benkanhal Gram Panchayat	<p>Provide local community and receptors such as residential school within area of influence, with information on upcoming construction activities, potential impacts and disturbances such as:</p> <ul style="list-style-type: none"> <li>■ Movement of vehicles</li> <li>■ Air Quality and Noise Disturbance</li> <li>■ Other issues or grievances</li> </ul>	Prior to start of construction	Village Level-Sulekal and Benkanhal
Procurement	Contractors and Equipment Suppliers	<ul style="list-style-type: none"> <li>■ Advertise the tenders for contracts for procurement of construction material, transportation services including, cars, lorries, etc., Security Services for the project with a focus on employing local vendors of appropriate capability and capacity to execute the assignment.</li> <li>■ Equipment suppliers and contractors to be informed about supply chain risks, non-compliances and ESMP implementation.</li> </ul>	Upon on-boarding of contractors and engaging equipment suppliers.	Project site
Occupational Health & Safety	Contractors, sub-contractors and workers	Meetings and Toolbox talks to provide briefings on the tasks to be completed and the standards to be followed, for quality control and health and safety protection.	Daily, during construction	Project site



Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Cultural sensitisation training programmes for migrant workers	Contractors, sub-contractors and workers	If migrant workers are engaged, to avoid potential conflicts with local workers and communities, cultural sensitisation training programmes should be conducted for migrant workers engaged.	Prior to start of construction	Project site
Gender sensitization programmes for migrant workers	Contractors, sub-contractors and workers	<ul style="list-style-type: none"> <li>■ If migrant workers are engaged for project construction, or workers from the other villages are involved, training should be provided on required lawful conduct in host community and they should be apprised of potential legal consequences for failure to comply with law.</li> <li>■ Training should also cover workplace harassment prevention.</li> </ul>	Prior to start of construction	Project site
Awareness programmes and sensitization campaigns for workers on communicable diseases	Contractors, sub-contractors and workers	If migrant workers (including workers travelling from other distant villages) are engaged, awareness programmes and sensitization campaigns on communicable diseases such as HIV/AIDS and other STDs, to be conducted for workers at the project site.	Prior to start of construction	Project site
Informing locals about the local government regulations and World Health Organisation's advice for the public on the Coronavirus disease.	Local community and Gram Panchayats in the project's core zone- Sulekal, Benkanhal, Tippanhal, and Kanakagiri	<p>Consultations with the local community and members of the Gram Panchayats in order to raise awareness and build on the implementation of local government requirements pertaining to COVID-19.</p> <ul style="list-style-type: none"> <li>■ Information regarding the updated and applicable local, state and national government regulations</li> <li>■ Information regarding available healthcare</li> </ul> <p>WHO's advice for the public regarding myths, safe practices, health and hygiene, symptoms etc.</p>	Prior to the start of the construction phase	Village Level-Sulekal Gram Panchayat
Implementation of Grievance Redressal Mechanism	All stakeholders	Monitor stakeholders' views and concerns with regard to project implementation process.	Across entire phase	Project site

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Reporting to the public on environmental, health and safety performance and implementation of the action plans and grievance procedure.	All stakeholders	Report on environmental, social, health and safety performance to be uploaded to project website and printed copies to be distributed among local community.	Once a year	Village Level- Sulekal and Benkanhal
<b>Operations Phase</b>				
Implementation of Grievance Redressal Mechanism (GRM)	All stakeholders	Monitor stakeholders' views and concerns with regard to the project implementation process.	Across entire phase	Project Site
Informing about upcoming maintenance and repair work	Local Community in Sulekal and Benkanhal Gram Panchayat	Provide local community with updated information on project progress and any upcoming maintenance and repair work.	Across entire phase	Village Level – Sulekal and Benkanhal
Informing locals about the local government regulations and World Health Organisation's advice for the public on the Coronavirus disease.	Local community and Gram Panchayats in the project's core zone- Sulekal, Benkanhal, Tippanhal, and Kanakagiri	<p>Consultations with the local community and members of the Gram Panchayats in order to raise awareness and build on the implementation of local government requirements pertaining to COVID-19.</p> <ul style="list-style-type: none"> <li>■ Information regarding the updated and applicable local, state and national government regulations</li> <li>■ Information regarding available healthcare</li> </ul> <p>WHO's advice for the public regarding myths, safe practices, health and hygiene, symptoms etc.</p>	Prior to the start of the operations phase	Village Level- Sulekal Gram Panchayat
<b>Decommissioning Phase</b>				
Informing about decommissioning activities	All stakeholders	<p>Provide local community with prior information related to de-commissioning activities such as:</p> <ul style="list-style-type: none"> <li>■ Removal of foundations and internal roads of the project and site restoration to pre-construction;</li> <li>■ The demolition of concrete pedestals of the ground mounted structure foundations etc.</li> </ul>	Prior to start of de-commissioning phase	Village Level- Sulekal and Benkanhal,

### 2.2.5 Information Disclosure

One of the most important aspects of any consultation or engagement process is the process of information disclosure. This process is not only part of certain regulatory requirements but also a requirement of the investors in the project. The process of information disclosure can be undertaken in two manners, either voluntary disclosure or disclosure as part of the regulatory requirements.

While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner. The process of disclosure involves the provisioning of information in an accessible manner (a manner which allows for easy understanding, such as in the local language) to the various stakeholders in a project. This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information but also allow for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

All relevant information such as local employment and training opportunities should be disclosed to the target stakeholders as early as possible.

Moreover, while undertaking the process of disclosure it is important that Ampyr and the contractors' employees endeavour to refrain from creating false expectations. When possible, an attempt shall be made to disclose actual numbers, even estimates, wherever available.

This disclosure of impact assessment reports and relevant plans is to be carried out in a manner which would make the information available to the community in an accessible and timely manner. Some of the disclosure related activities proposed for the future are as follows:

- Making copies of the main reports/executive summary, available in the Panchayat offices or the community centres and/or other locations readily accessible (through means such as pamphlets or leaflets) to the entire community in the locally preferred language.
- Provision of these reports and plans at the Panchayat Office or a small open meeting with the community so as to notify the stakeholders of the documents being disclosed and their nature and location as well as decide a date for receiving feedback from the community.
- Engage the community during the various other community development activities, including livelihood development, farmers meeting etc. These forums could also be used for the disclosure of the information to the community;
- As a part of the disclosure, the stakeholder reports or the key public consultation findings or the grievance related records can also be made available at project office;
- At minimum, such disclosure should be done on an annual basis to the various stakeholders through suitable manner.

### 2.3 Grievance Redressal Mechanism

This sub-section provides the Grievance Redressal Mechanism (GRM) for external grievances. The types of grievances that would be taken into consideration by the project under the ambit of this GRM are as follows:

- Grievances pertaining to any adverse impacts from project's operations on community assets or resources such as impacts on community's water supply system, damage to crops and livestock, damage to any private property or village structures from movement of vehicles, amongst others.
- Grievances due to project activities from construction and operations phase including noise and dust complaints during the construction and project related traffic blockages, etc.

- Grievances arising from land-based disputes including irregularities on payment of dues or differential land prices, land procured through unfair means, unauthorized encroachment by the project for storage of parts and materials or parking bays, amongst other issues.
- Conflict between any workers or labourers engaged under project operations and local community. Grievances pertaining to any misbehaviour, alcohol abuse, misconduct with any community member especially women, etc.
- Any other issues relevant to project operations.

### 2.3.1 Grievance Redressal Process for External Grievances

Ampyr is committed to establish relevant communication tools and strategies in order to communicate with stakeholders in respect to relevant disclosures and grievances. Ampyr’s E&S Manager, Project Manager and EPC/ O&M Project Managers will be responsible for the implementation of the external GRM. Ampyr will appoint a Grievance Coordinator at the Project level who will be responsible for undertaking verbal and written, as well as formal and informal communication to disclose the grievance mechanism. The stepwise redressal process for community grievances is given below:

**Figure 2.1 Stages in Grievance Redressal**



#### 2.3.1.1 Step 1: Publicizing the Grievance Procedure

- Ampyr should ensure public disclosure and accessibility through several channels/mechanisms (e.g., post, email, telephone, in-person, etc.) of its grievance handling and redressal process to the local community;
- The E&S Manager or a designated Grievance Coordinator should hold village level meetings or any other form of communication to disclose the grievance mechanism.
- The E&S Manager or a designated Grievance Coordinator will undertake the sensitization of the community for grievance redressal. Information on the following will be communicated to the community and vulnerable groups in particular (women headed households, women’s groups, scheduled castes, scheduled tribes, physically disadvantaged persons etc.):
  - Information on the types of complaints that fall under the ambit of this GRM;
  - Who can raise complaints (persons affected by Ampyr’s activities);
  - Where, when and how grievances can be lodged;

### 2.3.1.2 Step 2: Grievance Receipt and Recording

The receipt and tracking of grievances will involve the following stages:

- Collecting and recording grievances as they come in;
- Registering them in a grievance log; and
- Tracking them to reflect their status and important details.

There are multiple channels of reporting a grievance

- Grievances from the community can be registered at the site level project office directly with the designated Grievance coordinator, by any community member.
- Grievance forms will be maintained at a few strategic locations (substation/site office/main entrance gate), such that they are accessible by the community members. For written communication of complaints, a sample grievance form is included in **Appendix A**. The grievance log register will be recorded by the Grievance Coordinator and shared with the E&S Manager on a regular basis.
- Site level personnel (authorized to take grievances) might also take complaints verbally at group or individual community meetings, during field visits, or any resourcing engagement activities. These shall be noted in the grievance register as well.
- The grievance would be registered formally in the grievance register and contact information of the aggrieved person would be taken for back communication of resolution.

The grievances will be registered in a format as per the table below:

**Table 2.5 Grievance Register Format**

S. No	Date	Individual Name	Department/ Village	Medium of Communication	Details of Issue	Grievance within Scope	Investigation Requirement	Concerned Department	Timeline for Closing Grievance	Present Status (Open, Closed, and Pending)	Remarks

Keeping proper records will help to track cases, respond to grievances in a timely manner, check the status of complaints and track progress, measure effectiveness, and report on results #

The Grievance Coordinator will coordinate it with the personnel departments responsible for corrective actions and maintain a record of progress for example open, pending or closed. # An aggregated monthly report on the status of complaints will be maintained by the Grievance Coordinator and submitted to the E&S Manager who will track the resolution status. #

A few key considerations that will be kept during handling and management of grievances are as follows #

- All incoming grievances will be acknowledged immediately at the time of grievance being recorded. In case grievances are heard in village meetings, they will be recorded after the meeting and consented by the aggrieved in form of signatures of individuals or representative of the aggrieved group;
- A formal confirmation will be assigned to each grievance with a complaint number (or another identifier), and a timeline for response where possible and in the control of the Grievance Coordinator # to assure the complainant that the company is responding properly1

- If a complaint is received in person, it will be acknowledged on the spot; and
- Ampyr will explain up front what complaints are outside the scope of the grievance mechanism and what alternative avenues communities can use to address these potential issues#

### **2.3.1.3 Step 3: Reviewing and Investigating Grievances**

- The designated Grievance coordinator registering the grievance shall try to assess the nature of the grievance and try to resolve the grievance at hand or immediately in case feasible, within 10 working days;
- In-case the grievance is outside of the purview of the designated Grievance coordinator and E&S Manager and is complex in nature, they shall communicate the grievance to necessary site correspondents or officials at Ampyr (within initial 10 days), who will take up the issue for addressal;
- A committee for addressal of the issue might be formed that will discuss the grievance and assess necessary resolution, within 10 days of receipt of grievance to the committee;
- The issue may also be taken forward to relevant personnel in the management at Ampyr, in case their involvement is necessitated; and
- The E&S Manager may identify the nature of the grievance and choose to resolve the grievance by linking the resolution processes adopted by the internal GRM, internal complaints committee (prevention of sexual harassment- POSH committee) and third-party grievances, as applicable.

### **2.3.1.4 Step 4: Grievance Resolution**

- Once a decision is reached, the same shall be communicated back to the aggrieved person through the contact information shared by the same through phone, letter or in-person.
- The records within the grievance register shall also be updated and the case closed, when addressed to the satisfaction of the complainant;
- In case no decision is reached, the same shall also be communicated back to the aggrieved person;

At all stages of the grievance process, the aggrieved person is free to approach regulatory authorities and/or the courts for redress.

## **2.3.2 Handling of Other Grievances**

### **Non-Project Related Complaints**

It is sometimes difficult to determine which issues are related to the project and which are not. If in doubt, the Grievance Coordinator will accept the complaint and assess its nature, in consultation with the E&S Manager.

### **Complaints Constituting Criminal Activity and Violence**

In these cases, complainants shall be referred to the formal justice system. The Grievance Coordinator shall also record the same in the grievance register (and the database); however, in terms of action must refer it to the concerned administration for suitable legal and criminal action.

### **Commercial Disputes**

Commercial matters will be stipulated for in contractual agreements and issues shall be resolved through a variety of commercial dispute resolution mechanisms or civil courts.

### 2.3.3 Monitoring, Reporting and Reviewing the Procedure

Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism, and for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. Monitoring helps identify common or recurrent claims that may require structural solutions or a policy change, and it enables the project to capture any lessons learned in addressing grievances. Periodic review of internal and external grievances has to be carried out at the ESMS committee meetings.

#### 2.3.3.1 Monitoring Indicators

Grievance records will provide the background information for regular monitoring, both informal and formal. Depending on the extent of project impacts and the magnitude of grievances, monitoring measures will vary. Some of the monitoring indicators identified that can be a part of the monitoring mechanism may include:

- Tracking the number of grievances received and resolved (by gender, male/female/non-binary);
- Apart from reviewing each grievance and analysing effectiveness, using complaints to analyse systemic deficiencies;
- Recognize patterns in the grievances the project receives, and how they are being resolved;
- Communities preference/feedback to any of the several channels to submit grievances;
- Whether there is particular subgroup in the community raising complaints (for example, women, elderly);
- Whether there is a trend in particular groups particular kind of complaints relating to operations or accessibility or any specific issues;
- Effectiveness of different solutions in addressing various category of grievances.
- Whether there are matters significantly affecting company policy or requiring legal review.
- Issues of cultural appropriateness and transparency.
- Whether the existing system meets requirements established by the project as well as the expectations of all stakeholders.

Based on all grievances received, registered, documented and tracked through a central database (excel sheet), periodic reports (quarterly) shall be prepared for reporting to the management at Ampyr. This shall assist in tracking overall trends and patterns in concerns allowing emerging issues to be flagged and understood at an early stage. The statistics on grievance handling and redress are to be included in action plans and annual reporting. Monitoring and reporting also create a base level of information that can be used by the project to report back to communities.

Additionally, any events of community agitation or other significant disturbances, that may have the risk of business interruptions or hamper the image of the project, should be reported to the investors within 24 hours (verbally) and 72 hours (documented report) of the occurrence of the event.

## 2.4 Institutional Set-Up

In order to manage its engagements with the project stakeholders and meet the objectives of the SEP - GRM, Ampyr is required to ensure that this engagement process is given as much importance as the other project activities as well as guarantee the availability of certain resources.

For the management of the Environmental and Social aspects of the Project, three entities will be responsible for various activities linked with the Construction and Operations phases of the project, viz., Ampyr, EPC and O&M Contractors. However, the overall responsibility of implementation of the GRM lies with Ampyr, in close coordination with contractors, during the construction and operations phases.

Suitable personnel should be deputed at site or an existing staff with relevant skills and understanding of E&S issues should be allocated responsibilities to implement the SEP and GRM for the project. Additionally, the project team at site should be trained on aspects of engagement with various key stakeholders and the staff deputed/ identified for SEP and GRM implementation should be assigned the responsibility of documenting and maintaining records of all stakeholder engagement activities undertaken during the project lifecycle and providing updates to the corporate on the same. **Table 2.6** presents the format for recording all stakeholder engagement undertaken by various staff engaged at the project.

The specific roles of the entities in specific phases are described as follows:

**Table 2.6 Roles and Responsibility for GRM Implementation**

Phase	Entity & Role	Details
Entire Project Cycle	Ampyr will designate an Environment & Social (E&S) Manager during the construction and O&M phases, to oversee implementation of SEP and GRM.	<ul style="list-style-type: none"> <li>■ Since Ampyr is responsible for the overall management of Environment, Health, Safety &amp; Social (EHS&amp;S) issues, legal compliance, implementation of management systems and responsibility for any issues associated with the solar plant, it is thus responsible for overseeing the implementation of the SEP and GRM, across the project cycle.</li> <li>■ The Ampyr management will only address grievances that cannot be addressed at the level of the E&amp;S Manager during the construction and O&amp;M, working in collaboration with various teams.</li> </ul>
Construction Phase	The EPC contractor will designate a Grievance Coordinator who will oversee the redressal of grievances during construction of the solar plant.	<ul style="list-style-type: none"> <li>■ The EPC contractor will be responsible for redressal of workers' grievances in relation to construction of the solar plant.</li> </ul>
Operations & Maintenance Phase	The O&M contractor will designate a Grievance Coordinator who will oversee the redressal of grievances during O&M phase	<ul style="list-style-type: none"> <li>■ The O&amp;M contractor will be responsible for the Site-level supervisory role for EHS&amp;S issues, capacity building and implementation of the management systems.</li> <li>■ Therefore, during the O&amp;M phase, all internal and external grievances should be reported to the Grievance Coordinator.</li> </ul>

### 2.4.1 Training

Training shall be provided to all the staff at the project level, for handling of both internal and external stakeholders as per the modalities defined in the SEP, in order to allow for systemic engagement with stakeholders and avoid grievances. The training shall also cover understanding of grievance



mechanisms, relevant to their exposure and responsibilities for managers, all other employees, contractors and visitors, which shall include as a minimum:

- Expected behaviours and accepted practices when interacting with workers and stakeholders in order to avoid a grievance in the first instance;
- Routes available for workers to lodge grievances;
- Routes available for workers and other external stakeholders to lodge a grievance;
- Roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts), and;
- Recording and tracking procedures.

### 2.4.2 Reporting

During the lifecycle of the project, the performance of the SEP and GRM will be reviewed on a bi-annual basis. For the purpose of the review, the designated project staff, will prepare reports to be submitted to the project management team or corporate team of Ampyr, on a quarterly basis. During the operations phase, the reports will be submitted on an annual basis. The reporting format to be used for is presented below:

**Table 2.7 Format for Reporting on Stakeholder Engagement on Site**

S. No	Date	Location	Description of Engagement Activity	Key Stakeholders present (Names, Designation/ Village Name)	Points of Discussion	Key Takeaways/ Decision points

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**APPENDIX A**

**GRIEVANCE REDRESSAL FORM**

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**GRIEVANCE REGISTRATION**

<b>Grievance No.:</b>	<b>Date:</b>
<b>Name and Gender</b>	
<b>Village</b>	
<b>Phone no.</b>	
<b>Category of grievance</b>	
<b>Summary</b>	
<b>Concerned Department</b>	
<b>Name of person recording grievances:</b>	
<b>Designation of recording person:</b>	
<b>Proposed date of response to grievance:</b>	
<b>Signature of recording person</b>	<b>Signature of complainant</b>

**ACKNOWLEDGEMENT RECEIPT**

This receipt is acknowledgement of grievance registration by \_\_\_\_\_, on date \_\_\_\_\_. His/her case number is \_\_\_\_\_ and the date for response is \_\_\_\_\_.

<b>Name of the person recording grievances:</b>
<b>Designation of the recording person:</b>

**GRIEVANCE REDRESSAL RESPONSE**

<b>Date of redresses:</b>		
<b>Decision of E&amp;S Manager (give full details):</b>		
<b>Claimant accepts the outcome:</b>	<b>Accepted</b>	<b>Not accepted</b>
<b>Signature of claimant:</b>		
<b>Signature of Grievance Officer:</b>		

**Note:**  
Please note, if at any time the grievant is unsatisfied with the resolution of the grievance, they may choose to ask for an escalation to the next level or may resort to legal redress.