
Stakeholder Engagement Plan & Grievance Redress Mechanism for the 38 MW Balenahalli Wind Farm in Chitradurga, Karnataka

Ampyr Renewable Energy Resources One Private Limited

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Acronyms and Abbreviations

Name	Description
CBO	Community Based Organization
CSR	Corporate Social Responsibility
DIC	District Industries Commissioner
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EHS&S	Environment, Health, Safety and Social
FGD	Focus Group Discussion
GP	Gram Panchayat
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
NGO	Non-Government Organization
SEP	Stakeholder Engagement Plan
SGRE	Siemens Gamesa Renewable Energy
WTG	Wind Turbine Generator

Glossary

Term	Definition
Affected Party	Stakeholders who are affected by the Project operations, both positively and negatively. Within this, it is possible to distinguish between those that are directly affected and indirectly affected by the project operations.
Communication	Exchange of information either verbal or written between the project and the affected stakeholder.
Grievance	A grievance is any discontent or dissatisfaction that affects organizational performance. If the grievances among the stakeholders go unattended and unaddressed, it might lead to unhealthy relations and affect the efficiency of the project operations.
Operation	A location or activity that is operated by Fiza, Ampyr, SGRE and project contractors. Locations could include wind power project sites including activities for Transmission Lines, Labour accommodation, movement of machinery and equipment, etc.
Records of Communication/ Consultation	Records of communication / consultation may include key emails, letters, newsletters, memorandums, complaints, opportunities for improvement, records of distribution/attendance, records of formal and informal meetings and records of commitments.
Stakeholder	<p>In the present context, stakeholders comprise of groups/individuals who are directly affected by project operations namely the local community, land sellers, developers, contractors, employees, local labourers, vulnerable social groups, Gram Panchayats, local CSOs/NGOs, regulatory authorities and the district administration.</p> <p>The stakeholders groups are also categorised into primary and secondary stakeholders. A Stakeholder Engagement Plan (SEP) highlighting the type of stakeholders, including the mechanism for engaging with them has been developed for the project.</p>

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1. STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE REDRESS MECHANISM

1.1 Background

Ampyr, an Independent Power Producer (IPP), will own a 38 MW Wind Project currently being developed by a vertical of M/s Fiza group through its SPV i.e. Four EF Wind Power Pvt. Ltd. The project is situated in four villages falling in Dymavvanahalli, Pelorahatti, Ramjogihalli and Balenahalli villages in Chitradurga and Challekere talukas of the Chitradurga District, Karnataka. The construction for Phase I of the Project commenced in 2017 and construction was completed for 11 turbine foundations including erection of one of the turbines¹. Phase II began with land identification in early 2019 and the land details were still being finalized till the time of ERM site visit in the last week of September and in the process of procurement at the time of the ESIA preparation. The supply of the Wind Turbine Generators (WTG), erection and establishment of Environment, Health, Safety and Social (EHS&S) management systems, will be undertaken by Siemens Gamesa Renewable Energy (SGRE). The project phases include the planning phase, construction phase, operations and maintenance (O&M) phase as well as decommissioning phase and the impacts specific to each phase have been detailed in the ESIA report.

1.2 Objective and Scope of SEP and GRM

This document presents the Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM), which are applicable for the entire project lifecycle. The main objective of this document 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 Officer" will provide and 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.

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 systems 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
- Similarly, the objectives of Grievance Redressal Mechanism (GRM) are as follows:
 - To provide formal, systematic and confidential platform for registration and addressal of grievances;
 - To understand the problems of the stakeholders i.e. the employee, contractor, contract worker or the community 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;

¹ As stated in the ESIA report, one of the WTG has been decommissioned

- To provide transparency, fairness, and accountability to the stakeholders;
- To develop and maintain positive relations between the Project and its stakeholders.

1.2.1 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 considered to be a live document, to be updated regularly based on the emerging needs and patterns for engagement with the various stakeholders. The following phases of the project cycle will be covered:

- Planning Phase
- Construction Phase
- Operation & Maintenance Phase
- Decommissioning Phase

The planning phase includes land procurement through willing buyer willing seller principles, transfer and lease allotment among other activities such as site surveys and assessments.

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, laying of turbine foundations, turbine delivery and installation, and completion of internal electric connections.

The Operation and Maintenance (O&M) phase include regular remote monitoring of the WTG operations, normal greasing and cleaning activities, annual shut down for maintenance which will mostly include cleaning and greasing, change of parts etc., and internal road repairs as and when required.

The decommissioning activities include replacing the operating WTG turbine with newer or higher capacity or superior technology, to replacing WTGs that are experiencing failure, and abandoning project operations and removing WTG parts and the ancillary facilities.

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.

1.3 Stakeholder Identification and Categorisation

A stakeholder is defined as “any identifiable group or individual who can affect the achievement of an organization’s objectives or who is affected by the achievement of an organization’s objectives”.

Stakeholders thus 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**.

During the ESIA process, a stakeholder identification and prioritization was conducted for identifying the key stakeholders of the project, while keeping in mind the nature of the project and its setting. Furthermore, consultations were conducted with these identified stakeholders through a participatory approach. The table below presents the key stakeholders of the project.

Table 1.1 Stakeholder Group Categorisation

Stakeholder Groups	Primary Stakeholders	Secondary Stakeholders
Community	<ul style="list-style-type: none"> ■ Land sellers from Dyamavanahalli, Balenahalli, Pellorahatti villages ■ Developers and Contractors ■ Local Labourers ■ Morarji Desai Residential School 	<ul style="list-style-type: none"> ■ Local Community ■ Vulnerable Social Groups
Institutional Stakeholders	<ul style="list-style-type: none"> ■ Ramajohihalli and Dyamavvanahalli Gram Panchayats 	<ul style="list-style-type: none"> ■ Civil Society/ Local NGOs
Government Bodies	<ul style="list-style-type: none"> ■ Regulatory Authorities ■ District Administration 	

1.3.1 Methodology for Stakeholder Analysis

The significance of a stakeholder group is categorized considering the magnitude of impact of the Project on the stakeholder or degree of influence (power, proximity) of a stakeholder group on the Project functioning. The significance of the stakeholder group's importance for the Project and the requirement for engaging with them is identified as an interaction of the impact and influence. The matrix for significance is depicted below.

Table 1.2 Stakeholder Impact Matrix

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

1.3.2 Stakeholder Analysis & Influence

The table below has been used to classify the identified stakeholders (directly or indirectly impacting the project) in accordance to their levels of influence on the project.

Table 1.3 Stakeholder Analysis & Influence

Nature of Influence	Implication
High Influence	High Influence 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	Medium Influence 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.
Low Influence	Low Influence 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 in Section 5.1 above includes any person, group, institution or organization that is likely to be impacted (directly or indirectly) or may have interest/influence over project.

Though this document has attempted to be inclusive of all categories of stakeholders across the entire project cycle, it is difficult to identify all potential stakeholders and gauge their level of influence over the entire project cycle. Therefore, the project proponent is advised to consider this stakeholder mapping as a live document that should be revised in a timely manner to ensure applicability for any given period of the project cycle.

1.3.3 Stakeholder Expectations, Opinions and Concerns

The following table (

Table 1.4) presents the key issues identified during the discussion with the various stakeholders as well as the proposed mitigation measures,

Table 1.4 Stakeholder Analysis

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
Primary Stakeholders					
Land sellers	<ul style="list-style-type: none"> ■ The project involves procurement of both private and government land; ■ It was reported that land already purchased as well as proposed to be procured for the project were/ are being used for agriculture purpose; ■ Though the sale of land will not result in physical dislocation, whether any of the land sellers will be rendered landless or not could not be ascertained for all the landowners; ■ Farming is the primary source of living for most families in the study area but, the actual area of cultivation is considerably lower owing to the lack of adequate water and any irrigation facilities. Highly unpredictable pattern of rain coupled with frequent droughts often leads to poor farm yield/ productivity 	<ul style="list-style-type: none"> ■ Constituting the most critical stakeholder group, landowners who will sell land for the project have previously seen the process of land purchase as several windfarm projects have been set up in the surrounding area for couple of years; ■ It was understood during consultations that the farmers are willing to sell their land due to the low productivity of the agricultural land, dependency on monsoons and lack of irrigation facilities. ■ The land sellers who were consulted informed that the payments received after selling their land was reinvested into purchase of fertile land in other nearby villages. Selling land is therefore also considered as an option of liquidating their assets. 	<ul style="list-style-type: none"> ■ The stakeholder groups' influence on the project pertains to the smooth functioning of the project and the timely completion of the project activities. 	<ul style="list-style-type: none"> ■ The major concern of the stakeholder group till now is related to availability of employment opportunities that the project will generate. 	High
Developers and EPC Contractors	<ul style="list-style-type: none"> ■ Developer, EPC and O&M Contractors such as Gamesa and Fiza will be responsible for construction, operation and maintenance of the project. 	<ul style="list-style-type: none"> ■ Smooth operation of the construction activity and to complete the work within the scheduled time and cost. 	<ul style="list-style-type: none"> ■ Non-compliance to the legal requirements and causing disturbance to the fence line community may shape a negative 	<ul style="list-style-type: none"> ■ The contractors and sub-contractors play an important role during the project construction phase for timely commissioning of the project with 	High

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
			perception about the project	quality construction and within the stipulated budgetary provisions.	
Local Labourers	<ul style="list-style-type: none"> ■ A considerable section of the working population of the local area are agriculture labourers; ■ Due to the lack of industries in the region, the availability of employment in the unskilled category is limited; however the higher number of wind farms in the area makes for a higher labour availability with required skill set; and ■ However, during the harvesting season, availability of unskilled labour is a concern. 	<ul style="list-style-type: none"> ■ The local wage earners might have high expectations for employment in the project 	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ The major concerns of this stakeholder group may include; <ul style="list-style-type: none"> - Regular payment of wages for the work rendered; - Continued employment even beyond the completion of construction work; - Health and Safety issues at work; and - Holidays and leaves as per labour laws applicable etc. 	Medium
School Constructed near an erstwhile WTG location – Morarji Desai residential school	<ul style="list-style-type: none"> ■ There is a school that has been constructed near an erstwhile WTG location. ■ Though the WTG (BAL 10) foundation has now been abandoned and a new location (Alt BAL 10) has been developed away from the school's immediate proximity, but it is still located close to the project area and in the core zone of the project. 	<ul style="list-style-type: none"> ■ The local wage earners might have high expectations for employment in the project 	<ul style="list-style-type: none"> ■ 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. ■ 	<ul style="list-style-type: none"> ■ The major concerns of this stakeholder group may include; <ul style="list-style-type: none"> - Regular payment of wages for the work rendered; - Continued employment even beyond the completion of construction work; 	Medium

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
				<ul style="list-style-type: none"> - Health and Safety issues at work; and ■ Holidays and leaves as per labour laws applicable etc. 	
Gram Panchayats (GPs)	<ul style="list-style-type: none"> ■ Constituting the lowest strata of Decentralized Local Governance in the Country, a typical Panchayat consists of one or more revenue villages. This body of local governance was created through the 73rd Amendment to the Constitution of India; ■ Sarpanch and other members of the Gram Panchayat need to be actively involved in various activities relating to the economic development and social justice of their Panchayat. The smooth and hassle-free functioning of the project is also the onus of the Panchayats; ■ Ramajohilihalli and Dyamavvanahalli Panchayats cover nearly all the villages falling in the project area and an initial information meeting with these Panchayat are reported to have been conducted by officials of Fiza; 	<ul style="list-style-type: none"> ■ The influence of project on this stakeholder group is limited. 	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ The Gram panchayat might expect positive impact from the project in the following manner: <ul style="list-style-type: none"> - Generation of employment opportunities at the local level - Adequacy of the community development initiatives to be undertaken by the project Timely and adequate disclosure of information throughout the life of the project 	Medium
Regulatory Authorities	<ul style="list-style-type: none"> ■ This stakeholder group comprise of the central, state 	<ul style="list-style-type: none"> ■ The influence of the project on this stakeholder group pertains 	The stakeholder group can impose fines and penalties in cases of	The sole expectation of the Regulatory Authorities from the	Medium

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
	<p>and district level regulatory authorities.</p> <ul style="list-style-type: none"> ■ The primary authorities are: <ul style="list-style-type: none"> - The office of District Industries Commissioner (DIC) regulates Industrialization at the District Level; and - Karnataka Transmission Corporation Limited for power evacuation/grid connectivity etc. 	<p>to the role the project will play in the development of the project.</p> <ul style="list-style-type: none"> ■ 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. ■ The project should comply with applicable regulatory framework comprising of the guidelines and policies of the State Government such as Renewable Energy Policy 2014-2020. 	<p>failure of the project to comply with the various rules and regulations, which may lead to financial losses, generation losses, etc.</p>	<p>project Proponents will be abidance to all applicable guidelines, policies and laws.</p>	
District/Tehsil Administration	<ul style="list-style-type: none"> ■ The project area is administered at three levels by different Government Bodies: at the Chitradurga district level, at the Challakere Tehsil & Chitradurga block/tehsil level and at the Panchayat level in each village/or cluster of villages; ■ In this context, local administration refers to the district level and block level administration comprising of the offices of the Tehsildaar, District Magistrate Collectors, and Revenue officer etc.; and ■ The sub-registrar of the revenue department is responsible for registration of sale of land, land mutation, updating of records of transfer of land; 	<ul style="list-style-type: none"> ■ The primary concern of the stakeholder group can be: <ul style="list-style-type: none"> - project's compliance towards the regulatory requirement - role played by the project in the development of the area 	<p>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</p>	<ul style="list-style-type: none"> ■ The main expectations of the stakeholders from the project might be: <ul style="list-style-type: none"> - Compliance with the regulatory requirements and legal provisions specific to the project - Timely disclosure of information pertaining to the project activities - Involvement in the formulation and implementation of the community development activities throughout the life of the project 	Low

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
	<ul style="list-style-type: none"> ■ The representatives of Fiza have conducted an information meeting with District Forest Officer at Chitradurga to apprise about the project 				
Secondary Stakeholders					
Local Community	<ul style="list-style-type: none"> ■ The stakeholder group comprising of local communities around a radius of 1 kms inhabiting the project villages of Balenahalli and Pelorahatti, and Dymavvanahalli. ■ The study area comprises of; <ul style="list-style-type: none"> - General Castes: Brahmins, Lingayats, Marathis and Reddys; - SC: Adi Karnataka, Holeya, Mala; - ST: Chamars, Balais, Malis, Lambani, Nayak and Valmiki etc.; and - Minorities: Muslims, mostly Sunnis; ■ The local community, where ERM had undertaken consultations (Ramajogihalli, Balenahalli and Pelorahatti) are not aware of the present proposed project and were not informed, as the project is still in planning stage. 	<p>The project can play a critical role in the development of the community through economic opportunities and CSR projects that will be executed by an Implementation Agency.</p>	<p>Although, there were no reports regarding disruption of any projects due to the local community in the nearby areas in the past, the local community's support of the project and its activities is extremely crucial to ensure smooth functioning of the project and meeting of the timelines for the project.</p>	<ul style="list-style-type: none"> ■ Receiving benefits from the project in terms of employment and development of infrastructure and the community ■ Preference to the local community in contractor and employment opportunities from the project ■ Regular updates on the project activities and the opportunities from the same ■ Minimal disturbance to the community in regards to access issues, pollution and if there is any influx of migrant workers (Ampyr team informed that no temporary labour camps will be constructed and local unskilled and semi-skilled 	Low

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
				labourers will be hired)	
Vulnerable Groups such as women headed households, BPL and Landless households	<ul style="list-style-type: none"> This stakeholder group includes women headed household, BPL household and 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. 	In view of the poor social and economic conditions of the Vulnerable Communities, the project Proponent may have to provide engagement avenues for the group	<ul style="list-style-type: none"> The influence of this stakeholder group in regards 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. 	<ul style="list-style-type: none"> Appropriate community development activities in keeping with the needs of the community. Fair payments for the land purchased for the project at market rates (if any land has been purchased from any vulnerable household). Involvement in the community development activities and their implementation. Timely disclosure of information throughout the life of the project. 	Low
Civil Society/Local NGOs	<ul style="list-style-type: none"> There are many NGOs in the Chitradurga district such as Gram Vikas, Myrada and Shri Kshetra Dharmasthala working on the livelihoods of rural communities along with their related socio-cultural facets; These NGOs mainly work with women group by forming self-help groups and 	<ul style="list-style-type: none"> With respect to contributing towards the cause of local development, the project proponent can either participate in the ongoing developmental activities of the Government or might take up interventions on its own or through partnerships with NGOs and CBOs after obtaining prior approval from competent authorities. 	<ul style="list-style-type: none"> The opinion of the NGOs and Civil Society Groups towards a project is determined largely by whether the impacts of setting up of the project is being perceived in positive light by the local community 	<ul style="list-style-type: none"> The NGOs and Civil Society Groups often play a critical role in bringing to the limelight the issues of vulnerable communities in the society; and They can also play a major role in community mobilization, building 	Low

Relevant Stakeholders	Profile/ Status	Impact/Influence of the project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the project	Expectations, Opinions Key Concerns of Stakeholders	Overall Rating of Stakeholder Influence
	<p>conducting training for women group;;</p> <ul style="list-style-type: none"> ■ Additionally, NGO's based out of Delhi act as a social watchdog in matters relating to securing the livelihoods of rural communities along with their related socio-cultural facets ; ■ However, the number of such NGOs active in the study area is highly limited. No report regarding NGO's filing complaints against projects have been reported. 		and vulnerable groups or not.	trust and even participate in implementing CSR initiatives.	

1.3.4 Detailed Engagement Plan

Table 1.5 Detailed Stakeholder Engagement Plan

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Planning Phase				
Information Disclosure	All stakeholders	<p>Disclosure of information about construction progress:</p> <ul style="list-style-type: none"> ▪ Press release to local media ▪ Pamphlets for distribution and made available at public places ▪ Information provided directly to villagers through village information meetings from where land is being sourced ▪ Update on project and district administration website. ▪ Installation of informational boards near construction sites and local crossings, which include: <ul style="list-style-type: none"> - Schematic map of construction area; - Timeframe/timelines for construction completion; - Person/entity responsible for construction operations including contact details; - Information about available Grievance Redressal Mechanism (GRM). ▪ Consultation meetings, which include Focus Group Discussions (FGDs) with each identified stakeholder to capture their inputs on the project. <i>(Please refer to Section 5 for more information on Information Disclosure)</i> 	Prior to start of construction and as per demand or request from specific stakeholders.	Block Level and Village Level

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Consultations as part of ESIA Preparation	Land sellers	Documentation of land seller details as part of the land procurement process and consultations during ESIA and/or community needs assessment	During the preparation of the ESIA	Individual Land Owners' house or Panchayat office/ Revenue office
	<ul style="list-style-type: none"> ▪ Local Community; ▪ Vulnerable Communities including ST Population identified in Pellorahatti village; ▪ Gram Panchayat; ▪ Civil Society/Local NGOs 	<p>Focus group discussions and consultations with stakeholders in respect to impact on:</p> <ul style="list-style-type: none"> ▪ Land-holdings and loss of agricultural income; ▪ Vulnerable communities; including land sellers from ST community; ▪ Local employment; ▪ Ecology. 	During the preparation of the ESIA	Local Village Level

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
	Regulatory Authorities; District Administration	One-on-one meetings and consultations with the regulatory authorities and district administration shall be undertaken in respect to identifying the potential entitlements and mitigation measures for the identified impacts.	During the preparation of the ESIA	Office of Authorities
Engage and inform local authorities with regard to traffic movement and potential demographic influx (workers)	Local authorities	Local authorities should be: <ul style="list-style-type: none"> Engaged in the management of traffic flows and development of additional safety measures, if required. Informed about the influx of migrant workers, if applicable, and their duration of stay 	Prior to start of construction phase.	Office of authorities
Consultations with local community on health and safety	Local community residing in proximity/vicinity to project site	Consultation with local community to understand their concerns, raise awareness of risks and opportunities and identify solutions for issues related to: <ul style="list-style-type: none"> If migrant workers are engaged, during construction phase, there is potential for cultural conflicts; Access disruption to roads; Noise disturbance; Other issues or grievances The local community should also be informed about the Grievance Redressal Mechanism (GRM) for the project.	Prior to start of construction phase and as per local needs of the community, but not less than every three months.	Village level
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
Construction Phase				
Announcements and information related to construction activities	Local Community	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: <ul style="list-style-type: none"> Movement of vehicles Air Quality and Noise Disturbance Other issues or grievances 	Prior to start of construction	Block Level and Village Level

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
Local Employment and Procurement	Local Community	<ul style="list-style-type: none"> Advertise for the employment opportunities for the project in advance, through pamphlets being pasted at critical community hotspots, like Bus Stops, Government hospitals, etc.; Similarly, 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. 	Prior to start of and during construction phase	Village level
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
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"> 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. Training should also cover workplace harassment prevention. 	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
Implementation of Grievance Redressal Mechanism	All stakeholders	Monitor stakeholders' views and concerns with regard to project implementation process.	Across entire phase	Project site
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

Operations Phase

Purpose	Stakeholder Group	Details of Engagement	Frequency of Engagement	Proposed Location of Engagement
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	All stakeholders	Provide local community with updated information on project progress and any upcoming maintenance and repair work.	Across entire phase	Block Level and Village Level
Decommissioning Phase				
Informing about decommissioning activities	All stakeholders	Provide local community with prior information related to de-commissioning activities such as: <ul style="list-style-type: none"> ▪ Removal of WTGs and ancillary facilities; ▪ Removal of transmission tower; ▪ Demolition of Pooling Substance; ▪ Movement of vehicles; ▪ Air Quality and Noise Disturbance. 	Prior to start of de-commissioning phase	Block Level and Village Level

1.3.5 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 or staff of Fiza 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.

1.4 Grievance Redressal Mechanism

The following types of grievances would be taken into consideration by the project management for consideration under the ambit of this GRM.

1.4.1 Internal Grievances

1.4.1.1 Employee/ Workers Grievances

- Grievance related to working conditions: Examples include poor physical condition of work place, non-availability of proper tools and machines, unplanned changes in schedules and procedures;
 - Grievance related to Management policies: Examples include terms of employment, wage rates and payment, overtime and incentive related issues, working conditions, hours of employment, work load, training and settlement of terminal benefits , lack of opportunities for career growth amongst others;
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- Interpersonal grievances at workplace. Examples include discrimination of any form, poor relationship with supervisor, gender bias, unethical behaviour, harassment or abuse of any form etc.;
- The Grievance arising out or related to Management's decision on transfers, promotion, demotion and discharge on disciplinary grounds shall not come under the purview of this Grievance handling procedure.

1.4.1.2 Contractor and Contract Employees'/ Workers' Grievances

- Contractual workers' grievances can include denial of services based on discrimination, dissatisfaction with treatment by management, any dissatisfaction with working practices or conditions, concerns over health and safety, or any form of bullying or harassment;
- Also included are issues or grievances pertaining to contractor's internal management policies, any internal personal conflicts between the contractor and contractual employees and workers, contractors' style of working, etc.

1.4.2 Handling of Internal Grievances (Including Employee, Contractor and Contractual Employees and workers)

The following underlines the process that would be adopted in handling employees and contractors' or contractual workers' grievances:

Step 1: Publicizing the Grievance Procedure

- Ampyr shall ensure suitable public disclosure of its grievance handling and redressal process to their workers;
- The description of the procedure may be shared on information boards and the Environment & Social (E&S) Representatives of Ampyr, SGRE and Fiza may undertake a workshop session for all workers to share the purpose and process of such a procedure, encouraging legitimate complaints during the lifecycle of the project;
- Should the contractors have their own GRM, Ampyr will ensure that it is functioning effectively and review their grievance records on a periodical basis (monthly).

Step 2: Grievance receipt and recording:

- Any grievance from any employee (including contractor or contractor employee) is required to be detailed and submitted as per the grievance form provided with this document;
 - Along with the grievance form, necessary supporting documents to substantially explain the grievance may be attached;
 - The grievance form along with necessary attachment is required to be submitted with the site or project manager who in turn shall communicate the Environmental and Social (E&S) Representative;
 - The designated Grievance coordinator should be held accountable for receiving and maintaining all the grievances along with the reference number and assisting the E&S officer with the documentation and grievance redressal;
 - The following information will be recorded in a Grievance Register Format as depicted in **Table 1.6** below.
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Table 1.6 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

Step 3: Acknowledgment on receipt of Grievance:

- On receipt of a complaint in person, the E&S Representative should sign on the grievance form (stating acknowledgement of the grievance received) and hand over a copy to the aggrieved person on the same day, if possible;
- Alternatively, a written acknowledgement shall be sent back to the aggrieved person within three (3) working days from the date of receipt of any grievance;
- The acknowledgement shall mention the unique reference number allotted to the grievance;
- In case of any additional requirements are deemed necessary, the E&S Representative shall communicate the same to the aggrieved person.

Step 4: Addressal of grievances

- Grievances that are deemed resolvable directly at the site level would be redressed and the subsequent response of addressal would be communicated back to the aggrieved person;
- A database shall be maintained by the designated Grievance coordinator for all grievances received, their subject and status of closure;
- In case it is adjudged that the grievance addressal requires participation of additional site representatives, the E&S Representative will form a grievance redressal committee, and a meeting of the committee would be convened at appropriate time with or without the participation of the aggrieved person as deemed necessary by the committee. The grievance would be mutually discussed and resolution passed by the committee members in unanimity;
- The grievance committee shall comprise of but not limited to the E&S Manager, designated Grievance coordinator, technical representative at manager level from Ampyr, civil representative, among others;
- The decision taken by Committee members would be forwarded to Site Manager for further approval;
- Once approval from Site Manager is received, the decision would be communicated to the aggrieved accordingly;
- The committee shall resolve the grievance /complaint received before 15th of every month and grievance/complaint received after 15th of every month will be taken up next month;
- The committee shall endeavour to resolve the complaint/grievance within two (2) weeks from the date of receipt of the complaint/grievance. The resolution provided shall be in line with the terms and conditions of the project proponent's policies;
- In cases where additional time is required to resolve, the same may be noted in the grievance database (providing reason for delay) and practical/implementable timelines should be fixed.

Step 4: Back communication and closure of grievance

- The E&S Manager on behalf of the committee shall communicate the project's decision to the complainant and the same would inter-alia contain the details of the resolution offered or in-case of rejection, the reasons for the same;

- The decision taken by the Grievance Committee with the concurrence of Site Manager will be deemed as final.

1.4.3 External Grievances

1.4.3.1 Community Grievances

The following types of community grievances would be taken into account under this grievance handling procedure:

- 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, destruction of landscape and local visual aesthetics, project related traffic blockages, etc.
- Grievances arising from land based disputes including irregularities on payment of dues or inadequate land compensation, 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.

1.4.4 Handling of Community Grievances

Step 1: Publicizing the Grievance Procedure

- Ampyr should ensure public disclosure of its grievance handling and redressal process to the local community;
- The E&S Manager or designated Grievance coordinator should hold village level meetings or any other form of communication to disclose the grievance mechanism.

Step 2: Grievance receipt and recording

- Grievances from the community can be registered at the site level project office directly with the designated Grievance coordinator, by any community member.
 - A grievance register would be maintained at a few strategic locations (substation/site office/main entrance gate), such that it is accessible by the community members.
 - 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 would be registered in a format as per Table below which shall comprise of the following information at the minimum:
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Table 1.7 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

Step 3: Acknowledgment on receipt of Grievance:

- On receipt of a complaint in person, the E&S Representative should sign on the grievance form (stating acknowledgement of the grievance received) and hand over a copy to the aggrieved person on the same day, if possible;
- Alternatively, a written acknowledgement shall be sent back to the aggrieved person within three (3) working days from the date of receipt of any grievance;
- The acknowledgement shall mention the unique reference number allotted to the grievance;
- In case of any additional requirements are deemed necessary, the E&S Representative shall communicate the same to the aggrieved person.

Step 4: Reviewing and Investigating Grievances

- The designated Grievance coordinator registering the grievance shall try to assess the legitimacy of the grievance and try to absolve the grievance at hand or immediately in case feasible.
- 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/ Fiza/ SGRE 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.
- The issue may also be taken forward to relevant personnel in the management level at Ampyr, in case their involvement is necessitated.
- The committee shall endeavour to resolve the complaint/grievance within two (2) weeks from the date of receipt of the complaint/grievance.

Stage 5: Grievance Resolution and Communication

- 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, within 15 days of receipt of grievance. In case the resolution process is taking longer due to some reasons, an update on the expected date of resolution shall be communicated to the aggrieved;
- 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;
- The aggrieved person may approach and may repeat for a maximum of two (2) more times;
- In case the grievance is still not resolved, the aggrieved person is free to register the grievance with statutory authorities having necessary power and authority to resolve the grievance.

1.4.5 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, employees designated to receive grievances will accept the complaint and assess its legitimacy.

Complaints Constituting Criminal Activity and Violence

In these cases, complainants shall be referred to the formal justice system. The E&S Representative 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.

1.4.6 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.

1.4.6.1 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);
- Apart from reviewing each grievance and analyzing effectiveness, using complaints to analyze 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 sub group 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.

1.5 Institutional Set-Up

In order to manage its engagements with the project stakeholders and meet the objectives of stakeholder engagement and Grievance redressal processes, 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 Renewable Energy Resources, Siemens Gamesa Renewable Energy (SGRE) and Fiza Group. However, the overall responsibility of implementation of the GRM lies with Ampyr, in close coordination with Fiza Group and SGRE, during the construction and operations phases.

A 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. Annexure A 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 1.8 Roles and Responsibilities for GRM Implementation

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

	grievances during O&M phase	<ul style="list-style-type: none"> ■ Therefore, during the O&M phase, all internal and external grievances should be reported to the Grievance Coordinator, at SGRE. ■ Additionally, since Fiza Group will no longer be engaged after the construction phase, any external grievances from the community, during the construction phase, should also be reported to SGRE, to prevent any miscommunication on roles and responsibilities, and ensure continuity
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1.5.1 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 grievances;
- Roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts), and;
- Recording and tracking procedures.

1.5.2 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 1.9 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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