

**Environmental and Social Due Diligence Assessment of
Akaia Green Fuels, Compressed Biogas Project at
Shahjahanpur, Uttar Pradesh**

ABRIDGED FOR DISCLOSURE

July 2025

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Acronyms and Abbreviations

AZE	Alliance for Zero Extinction
CDP	Community Development Plan
CFM	Climate Fund Managers
CI2	Climate Investor Two
E&S	Environmental and Social (interchangeable with HSSE)
EHS	Environmental, Health and Safety
ESAP	Environmental and Social Action Plan
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FPIC	Free, Prior, and Informed Consent
GIIP	Good International Industry Practice
GRM	Grievance Redressal Mechanism
HSSE	Health and Safety, Social and Environmental (interchangeable with E&S)
IBA	Important Bird Areas
IC	Investment Committee
ICCPR	The International Covenant on Civil and Political Rights
ICESCR	The International Covenant on Economic, Social and Cultural Rights
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
ILO	International Labour Organisation
IP	Indigenous People
IPP	Independent Power Producer
KBAs	Key Biodiversity Areas
MSIHC	Manufacture, Storage and Import of Hazardous Chemicals
NA	Non-Agricultural
NOC	No Objection Certificate
RFR	Red Flag Review
SEP	Stakeholder Engagement Plan
ST	Scheduled Tribe
UN	United Nations

1. Introduction

1.1 Background

Through its Climate Investor Two (CI2) fund, Climate Fund Managers (CFM) is considering an equity investment in Akaia Green Fuels ("AGF"), a special purpose vehicle set up for the proposed 20 tonnes per day (TPD) CBG plant in Bhamauri village, Shahjahanpur District, Uttar Pradesh, India (the "Project"). AGF is an India-focused waste-to-value platform, which is planning to develop, construct, and operate compressed biogas (CBG) plants. The Project will use anaerobic digestion technology to convert agricultural residues into renewable gas, which will be supplied to Hindustan Petroleum Corporation Limited (HPCL) under the CBG City Gas Distribution (CGD) synchronization scheme. In addition to CBG, the Project will generate fermented organic manure (FOM) for commercial sale.

The Project is a greenfield project with construction planned to start in the first half of 2026. The location of the Project site is shown in Figure 1.



Figure 1: Project Location Map

Source: Google Maps

The Project will use waste residues¹ and therefore indirect land use change and impacts on natural habitat typically associated with biofuel projects (i.e. from growing feedstock) can be avoided. By providing a waste value chain, the Project will displace the burning of paddy straw.

¹ AGF hired Bureau Veritas India to assess compliance of the Project and the feedstock with the International Sustainability and Carbon Certification in the European Union (ISCC EU) principle for the compliance of Renewable Energy Directive (RED II). The report confirmed that the paddy straw, press mud and cow dung feedstocks are waste products.

1.2 Purpose of this Document

In accordance with the requirements of the CFM Environmental and Social Management System (ESMS), CFM has assessed the environmental and social (E&S) risks and impacts associated with a potential investment opportunity as part of its pre-investment due diligence and decision-making process.

To compliment this assessment, CFM and AGF appointed the following advisors to carry out external due diligence:

- Envint Services LLP ("Envint"), an environmental and social consultancy firm based in India was engaged to conduct an **E&S risk screening** of the Project.
- Anthesis Singapore Pte Ltd ("Anthesis"), a human rights and social advisor based in Singapore was engaged to conduct a **human rights due diligence assessment** on the feedstock value chain of the Project's three agri-waste types (i.e. paddy straw 70–80%; press mud, which is a sugarcane waste product 20–30%; and cow dung approximately 5% or less.

This document presents the results of the E&S due diligence assessment of the Project for public disclosure and includes the findings and recommendations of Envint and Anthesis, as presented in the confidential Envint E&S screening report and Anthesis human rights due diligence report dated 3 June 2025 and 7 March 2025 respectively, which were prepared for internal use by CFM and AGF. This document is therefore an abridged version of the Envint E&S screening report, the Anthesis human rights due diligence report, and CFM's internal ESDD.

2. Objective and Methodology

2.1 Overview

The objective of the E&S risk assessment is to highlight the potential E&S risks and impacts associated with the Project, any gaps that exist with respect to the E&S Reference Framework (see Section 3 below), and identify any fatal flaws or 'red flags' for consideration by CFM in its investment decision-making process.

CFM's approach to and process for E&S risk assessment during pre-investment due diligence is set out in its ESMS. Key steps in the process include:

- High-level screening of potential E&S risks and impacts;
- Assigning an initial overall Risk Categorisation to the Project (see Section 6 for more details);
- Including the E&S screening findings in the first (deal screen) paper submitted to the Investment Committee (IC) for approval;
- Conducting internal E&S due diligence (i.e. assessment by the CFM in-house ESG team) of the Project against the Reference Framework;
- Commissioning consultants to conduct external E&S due diligence assessment(s) of the Project against the Reference Framework, when required;
- Confirming the overall Risk Categorisation for the Project;
- Including the E&S due diligence findings in the final investment paper submitted to the IC for approval; and
- Preparing an Environmental and Social Action Plan (ESAP) setting out the measures required to address significant E&S risks/impacts and non-compliance with the E&S Reference Framework.

The scope of work of the E&S risk assessment conducted by CFM entailed the following:

- Review of existing Project documentation;
- Site visit to the Project site in India;
- Interviews with key internal (AGF) stakeholders;
- Interviews with landowners and community representatives;
- Evaluation of compliance of the Project with respect to permits, approvals and clearances that are applicable to compressed biogas projects. The assessment included forward-looking statutory requirements and confirmation of the stage of the Project when the permit/approval/clearance need to be obtained;
- Review of the land procurement process that has been undertaken to date to understand risks including consent, grievances, compensation, physical/economic displacement and litigations;
- Review of the identified Project location with respect to environmental, social and ecological receptors including proximity to areas of ecological significance, applicability of forest diversion, proximity to residential structures and proximity to waterbodies;
- Evaluation of the Project against the requirements of the E&S Reference Framework to identify compliance gaps;
- Identification of key E&S risks and impacts associated with the Project and assessment of the significance (low, medium or high) of each identified risk to identify potential fatal flaws or 'red flags';
- Identification of actions required to address compliance gaps, key identified risks/impacts or 'red flags'; and
- Confirmation of the overall Risk Categorisation.

The E&S issues identified in the assessment were rated according to CFM's risk categorization and classification system for E&S risks listed in Table 1.

Table 1: Risk Categories

Category	Description
Red Flag Issue / Fatal Flaw	• Issues that trigger aspects of the IFC Project Exclusion List/Prohibited Activities; • Issues that are not aligned to international standards and best practices and would have a significant financial implication (> US\$ 0.5 million) to mitigate; • Issues that can result in a significant regulatory non-compliance that may have repercussions for operational shut down, significant reputational damage and/or fines/criminal proceedings for the Project proponents; • Issues that would have irreversible impacts on ecological and/or social resources or receptors; and/or • Issues that could result in potential reputational and other impacts involving international media/watchdogs.
High Risk Issue	• Issues that are not aligned to the IFC Performance Standards and would have long-term repercussions in management of environmental and social performance of the Project (e.g. may extend outside of the typical project development timeframe advised by CFM); • Issues that could have a major financial implication (> US\$ 0.3 million) to mitigate; • Issues that may have reputational risks for the CFM or the project company and could lead to conflict with communities/external stakeholders; • Issues that are/may be regulatory non-compliances that can result in heavy fines, significant business interruptions and potential criminal proceedings in extreme scenarios; and/or

Category	Description
	Issues that could result in reputational and other impacts involving national media/watchdogs.
Medium Risk Issue	- Issues that may result in business interruption in the short-term but will not result in long-term implications for the Project; - Issues that are not aligned to international standards and best practices and could have a moderate financial implication (> US\$ 0.1 million) to mitigate; and/or - Issues that could result in reputational and other impacts involving local/regional media/watchdogs.
Low Risk Issue	Issues that are a non-alignment with IFC Performance Standards and/or good international industry practice (GIIP), but can be readily addressed at minimal cost and will not attract adverse stakeholder/media/NGO attention.

2.2 Scope of Work – E&S Screening by Envint

The scope of work of the external E&S screening assessment conducted by Envint on behalf of CFM/CI2/AGF was to highlight potential E&S risks associated with the Project and the gaps that exist with respect to the applicable Health, Safety, Security, and Environment (HSSE) legislations, regulations, policies and standards in India and international standards including the International Finance Corporation (IFC) Performance Standards (PS) and World Bank Environmental, Health and Safety (EHS) Guidelines. The assessment parameters are detailed in Table 2.

Table 2: Assessment Parameters

#	Theme	Details
1.	Overview of E&S legislation	Applicable E&S legislation which the Project needs to comply with during the planning, installation and operation phases.
2.	Overview of requirements for E&S permits/licences and the process to follow	Identification of the relevant E&S permits and application/approval process required to implement the Project, including requirements and applicability of the regulatory environmental impact assessment (EIA) process to meet laws/regulations in India.
3.	Associated facilities and activities	Identification of associated facilities and activities (as defined by IFC PS1) Potential impacts of the Project facilities and activities.
4.	Project stakeholders	Description of the key Project stakeholders, including confirmation of the ethnicity of the people and potential presence of indigenous peoples, ethnic minorities, and vulnerable persons.
5.	Gender and human rights	Overview of gender and human rights issues in the country/region.
6.	Project E&S competences	Assessment of the current approach to E&S risk management and availability of existing internal resources.
7.	Preliminary community development opportunities	Any community needs and opportunities identified during the course of the due diligence to be recorded.

Where applicable, Envint determined the differences between the requirements of the IFC PS and local standards and considered the most stringent of the requirements.

2.2 Scope of Work – Human Rights Due Diligence by Anthesis

The risk assessment was conducted in line with relevant international standards including the UN Guiding Principles on Business and Human Rights, the IFC PS, and the International Labor Organization (ILO) Core Labor Standards and Basic Terms and Conditions of Work, the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR).

The scope of work of the external human rights due diligence conducted by Anthesis on behalf of CFM/CI2/AGF entailed the following:

- Identify and assess actual and potential human rights risks in the feedstock value chain in a 200 km radius of the plant in Uttar Pradesh and in India more broadly.
- Assess and prioritise identified risks based on their severity and likelihood.
- Review the E&S consultant's (Envint) findings, guide them on conducting site visits and asking the right questions to rapidly assess relevant vulnerability indicators and see recommended actions, or a prioritised next-steps procedure.

The assessment parameters are detailed in Table 3.

Table 3: Assessment Parameters

#	Theme	Details
1.	Occupational Health, Safety & Operational Hazards	• Worker health and safety across feedstock supply chains • Fire risks from paddy straw storage • Injuries during paddy straw collection and transport • Press mud-related H&S risks at sugar mills including work at height and SO₂ exposure • Zoonotic disease risks from cow dung handling • Road and traffic safety risks during feedstock transportation
2.	Chemical, Environmental & Public Health Risks	• Long-term health impacts from pesticide use in rice and sugarcane farming and antibiotic use in livestock, including groundwater contamination and antimicrobial resistance concerns
3.	Labour Rights, Wages & Working Conditions	• Risks of unpaid dues or delayed payments to farmers and workers • Unpaid labour and wage discrimination against women
4.	Gender-Based Risks & Violence	• Gender-specific health risks affecting women, including injury and malnutrition • Risks of sexual violence and harassment against women and children in agricultural and rural contexts
5.	Modern Slavery & Child Protection	• Forced labour and debt bondage risks in agricultural supply chains • Child labour and child trafficking risks in rice and sugarcane farming
6.	Discrimination, Social Tensions & Community Safety	• Caste-based discrimination • Risks related to religious or communal violence impacting workers, transport routes and communities

3. E&S Reference Framework

CFM is committed to responsible investments and requires all of the projects in which it invests CI2 Funds to adhere to all applicable national legislative requirements, as well as international best practice standards for E&S risk and impact assessment and management. Specifically, CFM requires all projects receiving CI2 funds to comply with the following Reference Framework:

- National legislation applicable to health and safety, social and environmental (HSSE) issues, including labour and working conditions – see Section 3.1;
- International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012) – see Section 3.2;
- IFC EHS Guidelines for Electrical Power Transmissions and Distribution (2017);
- World Bank Group General and any applicable Industry Sector Environmental, Health and Safety (EHS) Guidelines – these are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) that are referenced in the IFC PS;
- International Labour Organisation (ILO) Core Labour Standards and Basic Terms and Conditions of Work; and
- International Bill of Human Rights and United Nations (UN) Guiding Principles on Business and Human Rights.

3.1 Applicable National Legislation

A summary of national laws that are applicable to the Project is provided below: –

- Bio Energy policy of Uttar Pradesh (2018)
- Forest conservation Act 1980
- Wildlife Protection Act 1972
- Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013
- Construction and Demolition Waste Management Rules, 2016
- Environment (Protection) Second Amendment Rules, 2002 – Diesel Generator Sets
- Noise Pollution (Regulation and Control) Rules, 2000
- The Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2016
- Plastic Waste Management Rules, 2016
- Plastic Waste Management Amendment Rules, 2021
- Solid Wastes (Management and Handling) Rules, 2016
- CGWA Notification on control and regulation of ground water resources
- Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996
- Central Motor Vehicles Act 1988
- Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2010 / The Indian Electricity Rules, 1956
- Uttar Pradesh Fire Prevention and Fire Safety Act, 2005, Section 7
- The Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (“HCR Rules”)
- Factories Act, 1948
- Boilers Act, 1923
- Gas Cylinder Rules 2016 Under Explosives Act, 1884
- The Static and Mobile Pressure Vessels (Unified) Rules 2016 (“SMPV Rules”)
- Essential Commodities Act, 1955
- Intimation to authorities under the Fertilizer (Inorganic, Organic or Mixed) (Control) Order, 1985

- The Public Liability Insurance Act, 1991 ("PLI Act") and Public Liability Insurance Rules, 1991 (the "PLI Rules")
- The Child Labor (Prohibition & Regulation) Act, 1986
- Minimum Wages Act, 1948
- Employees' State Insurance Act (ESI), 1948
- The Employees' Provident Funds (EPF) and Miscellaneous Provisions Act, 1952 amended up to 1996
- Employee Compensation Act 1923
- The Contract Labor (Regulation and Abolition) Act, 1970
- Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979
- Companies Act 2015

In accordance with the provisions of Environmental Impact Assessment (EIA) Notification 2006 and Bio Energy policy of Uttar Pradesh (2018), the Project is not required to obtain an Environmental Clearance from the State or Central Authority and therefore an EIA to comply with requirements in India is not required.

As per the CPCB classification of industrial sectors CBG plants based on crop residue (such as paddy straw) as feedstock are categorized under "White" category. 3 Hence the Project will not need to obtain a Consent to Establish and Consent to Operate from Uttar Pradesh Pollution Control Board.

The following approvals/permissions/licenses are required to be obtained by AGF for the Project:

- Permission to sell / transfer Agricultural Land (as per Uttar Pradesh Revenue Code, 2006 – through legal land registration with State authorities)
- Approval from Central Ground Water Authority (CGWA) for new borewell / groundwater use
- Intimation to Pollution Control Board (PCB) that Consent to Establish (CTE) / Consent to Operate (CTO) is not applicable (White Category)
- Registration under Building and Other Construction Workers (BOCW) Act, 1996
- New Electricity Connection Approval – As per Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2010
- Fire Safety No Objection Certificate (Fire NOC) – From Uttar Pradesh Fire Department under Uttar Pradesh Fire Prevention and Fire Safety Act, 2005
- Factories Act, 1948 Approvals
- Boiler Registration (if boilers are installed) – Under Boilers Act, 1923
- PESO License – Under Gas Cylinder Rules, 2016 (for storage and handling of compressed biogas)
- License under Static and Mobile Pressure Vessels (Unified) Rules, 2016 – For storage and transportation of compressed gas
- Notification under Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 – If hazardous chemicals fall under threshold quantities
- Certificate of Manufacture for Organic Fertilizer – Under Fertilizer Control Order (FCO), Essential Commodities Act, 1955
- Intimation to Designated Authority under Fertilizer (Inorganic, Organic or Mixed) Control Order, 1985 – For production, storage, and sale of organic fertilizer (PROM/FOM)
- Principal Employer Registration – Under Contract Labour (Regulation and Abolition) Act, 1970
- Contractor Labour License – For engagement of contract labour
- Inter-State Migrant Workmen Registration – If migrant labour is engaged

- ESI Registration – Under Employees’ State Insurance Act, 1948
- EPF Registration – Under Employees’ Provident Funds Act, 1952
- Employee Compensation Insurance – Under Employee Compensation Act, 1923
- Certificate of Incorporation (SPV) – Under Companies Act, 2015

3.2 Applicable International Frameworks

3.2.1 International Frameworks

A summary of international conventions and International Labour Organisation (ILO) instruments which India has ratified, and international frameworks that are applicable to the Project is provided below: –

- International Covenant on Civil and Political Rights (ICCPR), ratified in 1979
- International Covenant on Economic, Social and Cultural Rights (ICESCR), ratified in 1979
- International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), ratified in 1968
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), ratified in 1993
- Convention on the Rights of the Child (CRC), ratified in 1992
- Convention on the Rights of Persons with Disabilities (CRPD), ratified in 2007
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- International Covenant on Civil and Political Rights (ICCPR)
- Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- UN Development Programme (UNDP)
- UN Working Group on Business and Human Rights (UNWG)’s Human Rights Due Diligence and the Environment guidance
- Supply Chain Risk Assessment and Management Toolkit, developed by the Alliance of Diversity International and International Center for Tropical Agriculture (CIAT) in collaboration with the Dutch development bank, FMO
- IFC Performance Standards
- World Bank EHS Guidelines (2007)

3.2.2 IFC Performance Standards

In accordance with the CFM/CI2 ESMS, all projects receiving CI2 funds are required to conduct their operations in accordance with the applicable requirements of the IFC PS. The eight IFC PS and their applicability to the Project are discussed in Table 4 below.

Table 4: Applicability of the IFC PS to the Project

IFS PS	Summary of Requirements	Applicability to Project
P1: Assessment and Management of Environmental and Social Risks and Impacts	- Identify and assess environmental and social risks and impacts; - Develop and implement an appropriate environmental and social management system (ESMS) to integrate E&S standards and management programmes to address E&S risks and impacts into business operations; - To promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated; and - To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.	Applicable to the Project. The requirement is to be met through preparation of an ESIA, ESMP and ESMS; and preparation and implementation of a stakeholder engagement plan and grievance mechanism.
PS2: Labour and Working Conditions	- Treat workers fairly; - Provide safe and healthy working conditions; - Avoid the use of child or forced labour; and - Identify risks in the primary supply chain. (Requirements are guided by the ILO and UN Human Rights conventions).	Applicable to the Project. The Project will employ direct workers and contractors during construction and operation, requiring implementation of labour management procedures, occupational health and safety measures, and fair working conditions in line with national law and IFC PS2, including in the feedstock supply chain.
PS3: Resource Efficiency and Pollution Reduction	- Promote more sustainable use of resources, including energy and water; and - Integrate practices and technologies to avoid or minimise the potential adverse impacts of pollution from project activities.	Applicable to the Project. The Project involves resource use (water, energy, feedstock) and potential emissions, effluents, and waste stream, which will need to be assessed in the ESIA. Adequate requirements for management of risks in this regard will be included in the ESMS.
PS4: Community Health, Safety and Security	Adopt responsible practices to reduce risks to local communities through adequate emergency preparedness and response planning, responsible safeguarding of personnel and property, and by incorporating safety measures into design.	Applicable to the Project. Construction activities, transport of feedstock, and plant operations present community health and safety risks, which will need to be managed through traffic management, emergency preparedness, and safety controls.
PS5: Land Acquisition and Involuntary Resettlement	Avoid involuntary resettlement wherever possible and, where avoidance is not possible, minimise the impact through mitigation measures such as fair compensation and livelihood improvements.	Unlikely to be Applicable to the Project based on information known at this stage, however, further assessment is required. The land is expected to be acquired should a willing buyer-willing seller basis on

IFS PS	Summary of Requirements	Applicability to Project
		private land, with no physical or economic displacement expected. The applicability and process will be reviewed as part of the ESIA.
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	- Protect and conserve biodiversity. - Maintain the benefits from ecosystem services. - Promote the sustainable management of living natural resources through the adoption of practices that integrates conservation needs and development priorities.	Applicable to the Project. The Project is located in modified agricultural habitat, with no critical habitat identified; PS6 applies to ensure avoidance of unnecessary disturbance and appropriate biodiversity management measures. The Project will use waste residues and therefore indirect land use change and impacts on natural habitat typically associated with biofuel projects (i.e. from growing feedstock) can be avoided.
PS7: Indigenous Peoples (IP)	- Anticipate and avoid adverse impacts on communities of IP, or where avoidance is not possible, minimise adverse impact. - Foster respect for the human rights, dignity and culture of IP. - Promote sustainable development benefits for IP in culturally appropriate manner. - Promote informed consultation and participation of IP communities. In certain circumstances, Free, Prior, and Informed Consent (FPIC) is required.	Unlikely to be applicable for the Project based on available information. The Project does not fall within a Scheduled Area, does not affect customary or communal lands, and no Indigenous Peoples communities are located within or dependent on the Project footprint. The applicability will be reviewed as part of the ESIA.
PS8: Cultural Heritage	- Protect cultural heritage from the adverse impacts of project activities and support its preservation. - Promote the equitable sharing of benefits from the use of cultural heritage.	Not applicable to the Project. No known cultural heritage sites or archaeological remains have been identified within the Project area or area of influence; chance-find procedures will be applied as a precaution. The applicability will be reviewed as part of the ESIA.

4. Project Overview

4.1 Project Description

4.1.1 Overview

The Project will be located in the administrative boundary of Bhamouri village in Tilhar Tehsil of Shahjahanpur District, Uttar Pradesh (India). The Project site coordinates are (28°1'30.48"N; 79°38'34.89"E).

4.1.2 Feedstock

Three different types of feedstocks (paddy straw, press mud, and cow dung) will be used for the project. Details of the three types of feedstock are provided in the following table.

Table 5: Summary of Feedstock

Feedstock	Paddy Straw	Sugarcane Pressed Mud	Cow Dung
Amount to be procured	150 TPD for 350 days per year	114 TPD for 350 days per year	20 TPD for 350 days per year
Source	Biomass aggregators from large/smaller holder farmers	A by-product of the sugar industry and will be procured from a sugar mill.	Procured from individual cow sheds
Current use/disposal use of feedstock	Paddy straw is a waste product of rice cultivation and is typically burnt in-situ on the farms. It is found that, 70% of the paddy straw produced in the region is burnt in open field burning, around 10% gets into in-situ incorporation and around 20% is diverted to the CBG plants as feedstock and in process plants for boiler applications.	Press mud is waste product from sugar mill. Typically disposed on agricultural land, especially sugarcane fields. Sometimes sun-dried and stockpiled before distribution. Often co-composted with spent wash from distilleries to improve fertiliser value.	Cow dung is waste product from cow sheds and some may be used as manure in farms.
Availability	Available from the month of Mid Sept- Nov, with November being the period of highest availability.	Uttar Pradesh is a region with extensive sugar cultivation and there are many sugar mills. The press mud becomes available during the sugarcane crushing season, which runs from November to March. It will be stored in a covered bunker at the Project site.	The region has significant livestock population and cowsheds where mainly male cows are kept. The cow dung will be transported directly to the Project site.
Percentage of Feedstock (by dry weight)	60 to 80%	20 to 40%	About 5% - microbial seed (innoculum) to initiate the anaerobic digestion)
Distance from Project Site	Within 100 km of the Project site	Within 25 km of the Project site	Within 10 km of the Project site

4.1.3 Facility and Associated Facilities

The Project will have a capacity of 20 TPD and will utilize anaerobic digestion and biogas purification technologies. The Project will use three widely available types of agri-waste to generate biogas: paddy straw (left over from rice cultivation), press mud (a byproduct of sugar processing), and cow dung. The three feedstocks will undergo an anaerobic digestion process resulting in the production of biogas and leftover digestate, the latter of which can be used as a fertiliser. This biogas will further be purified to remove carbon dioxide, water vapour, and other compounds, resulting in CBG with a methane content of over 90%. CBG has a similar calorific value to compressed natural gas, making it a suitable renewable replacement.

The Project will use anaerobic digestion, and the core project components will include:

- Anaerobic digestors

- Digestate handling and storage facilities
- Biogas upgrading, compression and injection systems
- Feedstock storage areas

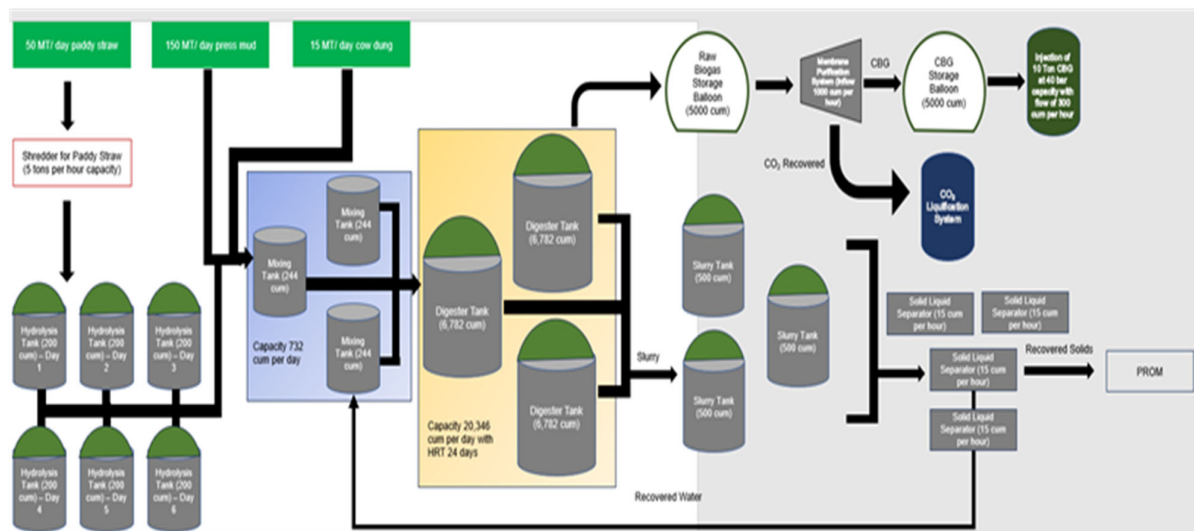
Associated Facilities will include:

- 4.5 km gas pipeline (connecting the Project to the national gas grid)
- 4.7 km electricity transmission line (connecting the Project to the Tilhar substation)
- Existing village access road with minor upgrades as required
- Temporary construction worker accommodation
- Feedstock supplier facilities

4.1.4 Process

The process will be divided into following seven stages:

- Stage I – Feedstock procurement and storage
- Stage II – Pre-Treatment & Feeding system
- Stage III – Hydrolysis and digestion system
- Stage IV – Biogas purification system
- Stage V – Biogas storage system
- Stage VI – Supply of biogas through injection in the pipeline system
- Stage VII – Manure management system



Source: Envint Report

Figure 2: Process Flowchart

4.2 Project Status

At the time that the due diligence assessments were conducted (between Q4 2024 – Q1 2025), construction works had not commenced yet. Construction will start in early 2026 and the Project is expected to begin operations in Q2 2027.

4.3 Land Requirement

Total permanent land requirement for the Project is approximately 29.4 acres (11.9 hectares). The entire parcel of land being purchased for the Project is privately owned agricultural land, belonging to a single family, and is expected to be acquired through willing buyer–willing seller arrangements.

Land acquisition has been undertaken directly with the landowner for the Project components, including the CBG plant, digesters, and storage areas. Physical or economic displacement will not occur and the Project does not involve government land, common property resources, or forest land. No additional permanent land acquisition is anticipated for associated facilities, which are largely aligned along existing corridors.

4.4 Workforce Requirement

The Project construction will involve a workforce of ~250 persons. Operation and maintenance of the Project will be carried out by a team of ~50 persons. Akaia Green Fuels has already hired an ESG Manager who is overseeing the development of the project.

4.5 Resource Requirement

The power supply during the construction phase will be sourced from the grid with a diesel generator to provide back-up power. During the O&M phase, power will be sourced from both the utility grid and solar energy through open access. According to the Project team, 70 percent of the renewable power will be procured via open access with a battery energy storage system (BESS) to store power and provide backup.

The water source for the construction phase will be determined by the EPC Contractor upon contract award. Groundwater will serve as the water source during the operation phase, and the necessary permissions from the State Authority will be obtained by the Project team.

4.6 Environmental and Social Setting

The Project site is in a rural area, and is modified agricultural land. There is one property on the site, which is used by the landowner on a part time basis.

Land use in the Project site and surrounding area is dominated by private agricultural land, village settlements, and local access roads. No undisturbed natural habitats are present within the Project footprint or immediate area of influence.

There are no protected areas, critical habitats, or biodiversity hotspots within or near the Project site¹, and the area is classified as modified habitat, which has been cultivated over the last 40+ years. Ecological sensitivities are considered low and manageable through standard mitigation measures.

¹ The nearest protected area is Pilibhit Tiger Reserve, which is 44 km to the northeast.

The Project does not fall within a Scheduled Area (Schedule V), although Scheduled Caste and Scheduled Tribe populations are present in nearby villages. These communities primarily engage in private agriculture and wage labour and do not have collective dependence on land within the Project footprint.

The nearest residential settlements to the Project site include Saidapur village, located approximately 200 m west of the Project boundary, as well as Bhamauri village (500 m to the northwest), Rampur village (400 m to the southeast), and Siura village (400 m to the south). No physical or economic displacement is expected. According to the site visit and consultations held, no religious structures were reported in the Project site.

5. Assessment of E&S Risks / Impacts

Table 6 below presents an assessment of the HSSE risks and potential impacts associated with the Project. Specifically, the assessment evaluates the AGF E&S documentation (where available) and compliance with the Reference Framework (the IFC PS specifically), as well as its adequacy to ensure IFC-compliant HSSE management. The assessment considers risks/impacts associated with developing, constructing and operating the Project including associated infrastructure, and which could be expected given the current Project status, E&S setting of the site and activities currently being completed or previously completed (including legacy issues).

Table 6: Summary of the Assessment of E&S Risks

Reference Framework	Risk Subject	Risk Assessment Findings	Risk Rating
IFC PS 1	E&S Permits and Approvals – Legal Compliance; ESMS implementation	Legal/permitting compliance issues could lead to non-compliance with the laws applicable in India and result in fines and risks to investors. The construction and operation phase of proposed Project will need different approvals from responsible authorities in compliance with the laws applicable in India. While a corporate-level ESMS exists, Project-specific ESMS and procedures (including emergency preparedness, stakeholder engagement and monitoring) are not yet fully established. All applicable permits to be obtained and a project-level ESMS aligned with IFC PS1 to be implemented prior to construction.	High
IFC PS1	Environmental and Social Impact Assessment (ESIA) and Social Management Plan (ESMP)	An ESIA has not been prepared to assess the risks and impacts of the project. The due diligence has identified several potential risks where further assessment is required to determine the level of risk/impact. The following are required to be assessed in the ESIA: • Impact of the Project on these assets/asset owners/community and related livelihoods, and review the compensation process. • Community health and safety (refer below to IFC PS4). • Occupational health and safety (refer below to IFC PS2) • Human rights risk in supply chain • Water sustainability	High

Reference Framework	Risk Subject	Risk Assessment Findings	Risk Rating
		An IFC-compliant ESIA and ESMP would need to be developed prior to CI2 funding the construction of the project.	
IFC PS1	Emergency preparedness and response	Risks associated with biogas handling, storage and transmission (e.g. gas leak, fire or explosion) could affect workers and nearby communities if not adequately managed. A Project-specific Emergency Preparedness and Response Plan (EPRP) is to be implemented and integrated into the ESMS.	High
IFC PS1	Human Rights in the Feedstock Supply Chain	The absence of a screening and monitoring mechanism in the feedstock supply chain of the Project can lead to risks such as the involvement of child or forced labour, noncompliance with environmental and social standards, and reputational damage. Identify and implement measures to address risks in the primary supply chain (see Section 6 Assessment of Human Rights Risks / Impacts).	High
IFC PS2	Labour and working conditions	Labour risks relate to contractor/subcontractor management, worker welfare, occupational health and safety, and compliance with Indian labour laws during construction and operation. Labour management procedures, including worker GRM and contractor compliance monitoring, to be implemented.	Medium
IFC PS2	Occupational health and safety (OHS) and Process Safety	Construction and O&M activities involve occupational health and safety and process safety risks requiring formal OHS procedures, process safety procedures, training and monitoring. Site-specific OHS plans, training and monitoring measures to be implemented in line with IFC PS2 and national requirements.	High
IFC PS3	Resource efficiency and pollution prevention	Water will be required for the plant's operations. Water sustainability study to be conducted during Project development phase to identify water resource risks to the Project and other water users. Construction and operation may result in air emissions, wastewater, solid waste and digestate generation, which are manageable with appropriate controls. Pollution prevention and resource efficiency measures to be implemented.	Medium
IFC PS3	Waste and by-product management	Improper handling of digestate and solid waste could result in localised environmental impacts. A waste and by-product management plan, including safe reuse or disposal arrangements, to be implemented.	Medium
IFC PS4	Community health and safety	Road Safety Construction material and feedstock transport and pipeline infrastructure could pose safety risks to nearby communities.	High

Reference Framework	Risk Subject	Risk Assessment Findings	Risk Rating
		- Traffic management and community safety measures to be implemented and communicated to affected stakeholders. Exposure to Emergency Events - Accidental incidents (e.g. fires) could have off-site impacts on surrounding communities without adequate preparedness. - Community emergency response procedures to be implemented in coordination with local authorities and communities. Security - The Project site will present hazards to the community if not adequately fenced/secure. - The Project will hire security personnel to work in the rural community – the presence and/or conduct could present a risk to the community (e.g. if there is excessive force, act outside the law, intimidate or harass, etc.).	
IFC PS5	Land acquisition and economic displacement	Land Acquisition Project land was acquired through voluntary transactions with a single landowner, and no physical displacement is anticipated. Voluntary land acquisition process and compliance with IFC PS5 principles to be verified and documented. Economic Displacement No significant economic displacement has been identified. However, agricultural labourers/potential sharecroppers were identified on site during CFM's site visit. Absence of livelihood impacts to be confirmed and supporting documentation to be maintained.	Low
IFC PS6	Biodiversity and ecosystem services	The Project is not located within protected or critical habitat, and biodiversity risks are limited. Mitigation measures to prevent ecological impacts to be identified during ESIA study and implemented during construction and operation.	Low
IFC PS7	Indigenous Peoples	No Indigenous Peoples as defined under IFC PS7 were identified within the Project area of influence. Absence of Indigenous Peoples to be confirmed during ESIA study.	Low
IFC PS8	Cultural heritage	No known cultural heritage sites were identified within the Project footprint; chance finds remain possible. A chance-find procedure to be implemented and contractor awareness measures to be conducted prior to construction.	Low
CFM ESMS	Gender Inclusion and Women's Economic Empowerment	Gender assessment indicates limited risk of adverse gender impacts, with opportunities to enhance women's participation through employment and engagement activities. A gender analysis and gender action plan should be	Low risk

Reference Framework	Risk Subject	Risk Assessment Findings	Risk Rating
		developed and implemented for the Project. The plan should aim to identify livelihood opportunities for women, as well as gender mainstreaming opportunities.	Positive Impact / Opportunity
CFM ESMS	Community Development	Community development has not yet started for the Project. A needs-based community development programme will be organised and undertaken in accordance with CFM's ESMS, based on the community needs assessment to be undertaken.	Positive Impact / Opportunity

6. Assessment of Human Rights Risks / Impacts

Table 7 below presents an assessment of the human rights risks and potential impacts associated with the Project. Specifically, the assessment evaluates the AGF E&S documentation (where available) and compliance with the relevant reference frameworks, as well as its adequacy to ensure human rights risk management in the supply chain. The assessment considers risks/impacts associated with developing, constructing and operating the Project, and which could be expected.

Table 7: Assessment of Human Rights Risks/Impacts

Reference Framework	Risk/Impact and Description	Risk Assessment Findings	Risk Rating
• ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Workers' right to health and safety in feedstock supply chain	The procurement of these the Project's feedstock materials (press mud, paddy straw, and cow dung) may involve workers operating under hazardous conditions, which can lead to supply disruptions due to health-related absenteeism or accidents. Moreover, the handling of organic waste materials like press mud and cow dung without proper protective measures can expose workers to pathogens, further compromising their health.	Medium
• ICESCR • ICCPR • IFC PS4	Safety of workers and nearby communities due to accidental fires caused by poor paddy straw management	Paddy straw is inherently combustible, and inadequate storage and handling practices may increase fire risks at aggregation sites. Such incidents could pose safety risks to workers and nearby communities and potentially disrupt feedstock availability.	Medium
• ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Injury from collecting or transporting paddy straw	The collection and transportation of paddy straw involve physical labour and machinery use, which may expose workers to injury where safety practices and training are insufficient. These risks are characteristic of the agricultural sector and can affect continuity of supply.	Medium
• ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Workers' right to health and safety in press mud production	Press mud production in sugar mills may involve hazardous working conditions, including exposure to gases and physically demanding tasks. These health and safety risks are linked to existing industrial practices in the sector and may affect workers if controls are not effectively implemented.	Medium

Reference Framework	Risk/Impact and Description	Risk Assessment Findings	Risk Rating
• ICESCR • IFC PS2	Exposure to zoonotic diseases from handling cow dung	Handling of cow dung may expose workers to health risks associated with zoonotic diseases, particularly where hygiene and protective measures are limited. These risks are recognised as part of broader livestock and agricultural waste management practices.	Medium
• ICESCR • IFC PS3	Long-term health complications from use of pesticides and antibiotics	The use of pesticides in crop farming and antibiotics in livestock production presents potential long-term health risks to workers and communities. These impacts are largely cumulative and sector-wide, reflecting prevailing agricultural practices rather than project-specific activities.	Medium
• ICESCR • ICCPR • IFC PS4	Road accidents during transportation of feedstocks	Transportation of feedstocks relies on road networks and vehicle use, which may pose accident risks to drivers, other road users and communities. Such risks are influenced by local road conditions and transport practices.	Medium
• CEDAW • ICESCR • IFC PS2	Gender-specific health risks affecting women: injury and malnutrition	Women involved in agricultural activities may face heightened health risks due to existing gender inequalities, including nutritional deficiencies and limited access to appropriate tools or protective measures. These risks reflect broader social conditions affecting women in rural supply chains.	Medium
• ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Unpaid dues or late payments	Delayed or unpaid payments to farmers and workers represent a recognised risk within informal agricultural supply chains. Such practices may increase financial vulnerability and undermine secure livelihoods.	Medium
• CEDAW • ICESCR • IFC PS2	Unpaid labour or wage discrimination against women	Women face heightened risks of wage discrimination and unpaid labour due to entrenched gender norms in agricultural work. These risks contribute to economic inequality within the supply chain.	Medium
• ICCPR • ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Forced labour on farms	Forced labour and debt-bonded labour are recognised risks within certain agricultural contexts. While not necessarily project-specific, exposure to such practices may occur through sourcing from informal supply chains.	High
• CRC • ICESCR • ILO Declaration on Fundamental Principles and Rights at Work • IFC PS2	Child labour on farms	Child labour remains a documented risk in agricultural production, driven by poverty and lack of enforcement. This represents a salient human rights risk within the broader supply chain context.	High
• ICERD • ICCPR • ICESCR • IFC PS1	Discrimination based on caste	Caste-based discrimination continues to affect access to safe working conditions, fair remuneration and grievance mechanisms for marginalised groups. These systemic inequalities heighten vulnerability in agricultural supply chains.	High
• ICCPR • IFC PS4	Religious violence	Periodic communal tensions in the region may pose indirect risks to worker safety and transport routes.	Medium

Reference Framework	Risk/Impact and Description	Risk Assessment Findings	Risk Rating
		These risks are contextual and external to project operations.	
• CEDAW • CRC • ICCPR • IFC PS4	Sexual violence against women and children	Women and children in rural and agricultural settings face heightened risks of sexual violence and harassment, often compounded by limited reporting and access to remedies. This represents a significant contextual human rights risk.	High

7. Project Risk Category

An overall E&S risk rating (Risk Category) is assigned to the Project, based on the description of the categories presented in Table 8, as per the CFM/CI2 ESMS.

Table 8: : Risk Category Definition

Risk Category	Description
Category A (High risk) <i>Equivalent to IFC Category A</i>	High risk projects involve business activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented. This category includes projects that (i) trigger one or more of IFC PS 5, 6, 7 or 8 ⁽¹⁾ or (ii) demonstrate a context of social/political conflict or severe security issues that pose a significant potential risk to the project or (iii) present potential significant adverse social or environmental impacts which are diverse, irreversible or unprecedented.
Category B+ (Medium high risk) <i>Equivalent to IFC Category B</i>	Projects with potential adverse social or environmental impacts that are generally beyond the site boundaries, largely reversible and can be addressed through relevant mitigation measures.
Category B (Medium low risk) <i>Equivalent to IFC Category B</i>	Projects with potential limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.
Category C (Low risk) <i>Equivalent to IFC Category C</i>	Projects with minimal or no adverse social or environmental impact.

Based on these definitions and assessment of E&S risks and impacts presented in Section 5, the Project has been categorised as a **Category B+** project. While some potentially significant risks/impacts beyond the site boundaries have been identified, these are, largely reversible and readily addressed through identified mitigation measures.

8. Environmental and Social Action Plan (ESAP)

Table 9 below sets out the proposed actions to be taken by the Project to mitigate the potential risks/impacts and ensure compliance by the Project with the E&S Reference Framework requirements. The proposed mitigation measures will form the basis of the Project ESAP to be

¹ Projects in this bracket are a narrow highest risk subset of all projects that trigger PS 5, 6, 7 and 8. They entail the following impacts: complex resettlement (subset of PS5); impacts on critical habitat (PS 6, paragraphs 16-19); all projects triggering the FPIC requirements of PS 7 (PS 7, paragraphs 13-17); and impacts on critical cultural heritage (PS 8, paragraphs 13-15).

agreed upon between CI2 and AGF to detail the required E&S actions and timelines to be implemented by the Project.

Table 9: E&S Risk/Impact Mitigation Measures

#	Reference	Requirements
1.	IFC PS1 – Permitting, ESMS	Permits and Licences - Obtain the necessary permits to construct and operate the Project: - Develop and maintain a legal register for the tracking of all permits and licenses that are applicable for the Project across the lifecycle. ESMS - Develop and implement an IFC-compliant Environmental and Social Management System (ESMS) covering AGF and all contractors/subcontractors operating at the site. - Ensure the ESMS incorporates risk identification, mitigation measures, monitoring, internal reporting, corrective action tracking, and periodic review.
2.	IFC PS1 – ESIA and Management Plans	- An ESIA and relevant management plans, including ESMP and stakeholder engagement plan (SEP) to be developed. The ESIA is to include an assessment of: - Impact of the Project on these assets/asset owners/community and related livelihoods, and review the compensation process. - Community health and safety (refer below to IFC PS4). - Occupational health and safety (refer below to IFC PS2) - Human rights risk in supply chain - Water sustainability - Disclose the ESIA Non-Technical Summary to stakeholders. - Carry out stakeholder engagement implement the Stakeholder Engagement Plan (SEP). - Develop, communicate and implement Project Grievance Redressal Mechanism (GRM) for communities including awareness rising and information dissemination.
3.	IFC PS1 – Emergency preparedness and response	A Project-specific Emergency Preparedness and Response Plan (EPRP) is to be implemented and integrated into the ESMS.
4.	IFC PS1, PS2, PS4, ICCPR, ICESCR, ILO Declaration on Fundamental Principles and Rights at Work – Human Rights in the Feedstock Supply Chain	Implement measures to address risks in the primary supply chain (as identified in Section 6 Assessment of Human Rights Risks / Impacts), which include: - Enhancing supply chain due diligence and supplier monitoring mechanisms - Embedding human rights clauses in contracts - Improving feedstock sourcing traceability - Aligning ESMS with human rights risks - Establishing supply-chain GRM.

#	Reference	Requirements
5.	IFC PS2 – Labour and Working Conditions	Labour management procedures, including worker GRM and contractor compliance monitoring, to be implemented. Where accommodation is provided by contractors/subcontractors, it will need to meet the requirements of IFC PS2 (i.e. each worker shall be provided a bed, fan and mattress) and there shall be adequate shelter, sanitary facilities, cooking facilities, ventilation and fire protection, as well as accommodation management and emergency plan in place (reference shall be made to the accommodation checklist). Where transport of workers is provided by contractors/subcontractors and ensure that this is in road-worthy, licensed and maintained vehicles.
6.	IFC PS 2 – Occupational Health & Safety (OHS) and Process Safety	Site-specific OHS plans, training and monitoring measures to be implemented in line with IFC PS2 and national requirements.
7.	IFC PS3 – Resource efficiency and pollution prevention	- Water sustainability study to be conducted during Project development phase to identify water resource risks to the Project and other water users. - Pollution prevention and resource efficiency measures to be implemented.
8.	IFC PS3 – Waste and by product management	A waste and by product management plan, including safe reuse or disposal arrangements, to be implemented.
9.	IFC PS4 – Community Health and Safety	- Traffic management and community safety measures to be implemented and communicated to affected stakeholders. - Community emergency response procedures to be implemented in coordination with local authorities and communities. - Fenced and secure site. - Training and oversight of security guards. Community GRM to be in place.
10.	IFC PS 5 – Land acquisition and economic displacement	- Voluntary land acquisition process and compliance with IFC PS5 principles to be verified and documented. - Absence of livelihood impacts to be confirmed and supporting documentation to be maintained.
11.	IFC PS6 – Biodiversity	Mitigation measures to prevent ecological impacts to be identified during ESIA study and implemented during construction and operation.
12.	IFC PS7 – Indigenous People	Absence of Indigenous Peoples to be confirmed during ESIA study.
13.	IFC PS8 – Cultural Heritage	A chance find procedure to be implemented and contractor awareness measures to be conducted prior to construction.
14.	CI2 Climate	Appoint a consultant to carry out a Climate Risk and Vulnerability Assessment and implement the Climate Adaptation Plan.

#	Reference	Requirements
15.	CI2 Gender Mainstreaming	- Develop and implement a gender analysis and gender action plan for the Project. The plan should aim to identify livelihood opportunities for women, as well as gender mainstreaming opportunities. - The plan may be incorporated into the scope of work for the ESIA. The ESIA team will be required to include a gender expert.
16.	CI2 Community Development	- Community needs assessment to be commissioned. - Finalise and implement the Community Development Programme (CDP) in accordance with CFM's requirements.

9. Conclusion

The assessment has considered risks/impacts associated with developing, constructing and operating the Project including associated infrastructure, which could be expected given the current Project status, E&S setting of the site and activities currently being completed or previously completed (including legacy issues). The assessment has been undertaken based on the information known at the stage of development during the time of reporting.

No "red flag" issues have been identified. High risks were identified with regards to Legal Compliance, ESMS implementation, ESIA, ESMP, Emergency Preparedness and Response, Human rights in the feedstock supply chain (child labour, forced labour, caste-based discrimination, gender-based violence), OHS and Process Safety, and Community health and safety. Measures have been proposed to address the key E&S risks and impacts identified in this assessment and will form the basis of the ESAP to be agreed between AGF and CI2 for implementation.

In addition, there are opportunities to improve current E&S risk management, as well as generate positive impacts through a community development programme and implementation of a gender action plan. The Project will also generate clean energy, reduce local air pollution, and provide skilled and unskilled jobs, particularly during the construction phase.

Annexure: Photo Log



Photo 1: Project site (CBG Plant site)



Photo 2: Project site (CBG Plant site)



Photo 3: Access Road to Project site



Photo 4: Access Road to Project site



Photo 5: Access Road to Project site



Photo 6: Gas Grid Connection Point



*Photo 7: Tilhar Electric Powerstation
(Electricity Grid Connection Point)*



Photo 8: Sugar Mill (Pressmud Supplier)