

Resettlement Plan

Document stage: Draft for Consultation
Project Number: 49107-003
May 2018

IND: Tamil Nadu Urban Flagship Investment
Program (TNUFIP)– Rajapalayam Underground
Sewerage System

Prepared by Rajapalayam Municipality, Government of Tamil Nadu, for the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of 18 January 2018)

Currency Unit	–	Indian rupee(₹)
₹1.00	=	\$0.0157
\$1.00	=	₹63.8350

ABBREVIATIONS

ADB	–	Asian Development Bank
ASO	–	Assistant Safeguards Officer
BPL	–	Below Poverty Line
CMSC	–	Construction, Management and Supervision Consultant
CMWSSB	–	Chennai Metro Water Supply and Sewerage Board
EUP	–	enter upon permission
FGD	–	focus group discussion
GIAC	–	Governance Improvement and Awareness Consultant
GoTN	–	Government of Tamil Nadu
GRC	–	grievance redress committee
GRM	–	grievance redress mechanism
IPP	–	indigenous peoples plans
MAWS	–	Municipal Administration and Water Supply Department
NOC	–	no objection certificate
PIU	–	project implementation unit
PMU	–	project management unit
PWD	–	Public Works Department
RCC	–	reinforced cement concrete
RFCTLARR	–	Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement
R&R	–	resettlement and rehabilitation
RoW	–	right-of-way
SIA	–	Social Impact Assessment
SPS	–	Safeguard Policy Statement
SRSE	–	social and resettlement safeguard expert
STP	–	sewage treatment plant
TNUFIP	–	Tamil Nadu Urban Flagship Investment Program
TNUIFSL	–	Tamil Nadu Urban Infrastructure Financial Services Ltd.
TWADB	–	Tamil Nadu Water Supply and Drainage Board
UGSS	–	Underground Sewerage System
ULB	–	urban local body

NOTE

In this report, "\$" refers to US dollars.

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EXECUTIVE SUMMARY

1. **Subproject Scope.** The Tamil Nadu Urban Flagship Investment Program (TNUFIP) is designed under the multitranchefinancing facility (MFF) modality of ADB financing and will primarily focus on improvement of water supply and sewerage services in selected cities of the state. The TNUFIP is envisaged to be structured under three main components: (i) investment in municipal infrastructure namely water supply and sewerage, (ii) municipal reform-based activities, and (iii) technical assistance for design, supervision, program management, reforms, and climate change. The proposed subproject in Rajapalayam will cover the entire city spread over 11.36 square kilometers (km²). to cater to projected population of 190,000 for the intermediate design year of 2035. Subprojects comprise: (i) laying of around 156 kilometers (km) of sewer network of double walled corrugated (DWC)/reinforced cement concrete (RCC) pipes ranging from 200-700 millimeter (mm) dia; (ii) laying of 19 km of pumping mains of 100-700 mm dia; (iii) construction of three sewage pumping stations; (iv) construction of four sewage lift stations; and (v) construction of 21.85 million liters per day (MLD) sewage treatment plant (STP).

2. **Key Findings.** There is no permanent/temporary land acquisition envisaged for implementation of proposed subproject components. Construction of SPS-1 will require purchase of government land (HR&CE department). The remaining sewage pumping stations, lift stations and sewage treatment plant (STP) will be either accommodated on vacant municipality lands or other Government department lands (without requirement of any land purchase). New sewer system will be laid within road rights-of-way (ROW) in the center of the road by cutting black top. In wider roads, like state highway and national highway, divided roads etc., sewers will be laid along the edge of the road, but mostly within the black top portion. Potential temporary impacts are assessed due to laying of new pipe networks. To estimate the potential temporary impacts, all roads/streets in project area were screened through transect walks for any encroachments on black top portion/ROW and detailed surveys were conducted for roads where temporary impacts were identified (December 2017). Based on this, a total of 69 roadside movable/transitory businesses that are currently within ROW are identified as potentially (temporarily) affected. These businesses are mainly (61%) tea/food/juice related stalls and vegetable/fruit stalls. Around 22% have shop businesses like Electrical, bike workshops, fancy/plastic stores, flour mill etc. while an additional 17% have small / petty businesses. None of the surveyed potential affected persons belong to scheduled tribes or are women headed households. A close to 16% was assessed to be below poverty line (BPL). Average monthly income for potentially affected BPL is estimated at ₹170 per day and overall average for all affected persons is ₹347 per day.

3. **Recommended Actions.** A draft resettlement plan has been prepared for Rajapalayam subproject components and mitigate temporary impacts envisaged during construction/pipe laying. This Resettlement Plan is in line with the ADB's Safeguard Policy Statement (SPS), 2009 and resettlement framework prepared for TNUFIP. A total resettlement budget (only compensation and grievance redress mechanism or GRM costs) is estimated at ₹9.99 million (approximately \$156,000) which includes land cost, livelihood losses for 25 days and cost towards restoration of CPRs. A detailed measurement survey will be conducted in sections ready for implementation, based on detailed design, and the draft resettlement plan updated, based on survey results. The draft resettlement plan will be reviewed by project management unit (PMU) and submitted to ADB for approval prior to start of construction. In line with the Resettlement Framework, the Resettlement Plan has also laid down the structured outline for required institutional and implementation arrangements with schedule, grievance redress mechanism, consultation and disclosure activities and monitoring and evaluation. A

summary of resettlement framework and resettlement plan in local language will be disclosed to representatives of all key stakeholders through a city level stakeholder workshop. A hard copy of summaries will also be made available at ULB offices and full documents will be uploaded at their/ADB websites. Project Implementation Unit's Assistant Safeguard Officer (PIU's ASO) will be responsible for updation& implementation of Resettlement Plan. Project management unit's Social Project Officer (PMU's SPO) is responsible for approval and implementation monitoring of RPs. Governance Improvement and Awareness Consultant (GIAC) will assist in monitoring Resettlement Plan implementation.

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I. SUBPROJECT DESCRIPTION

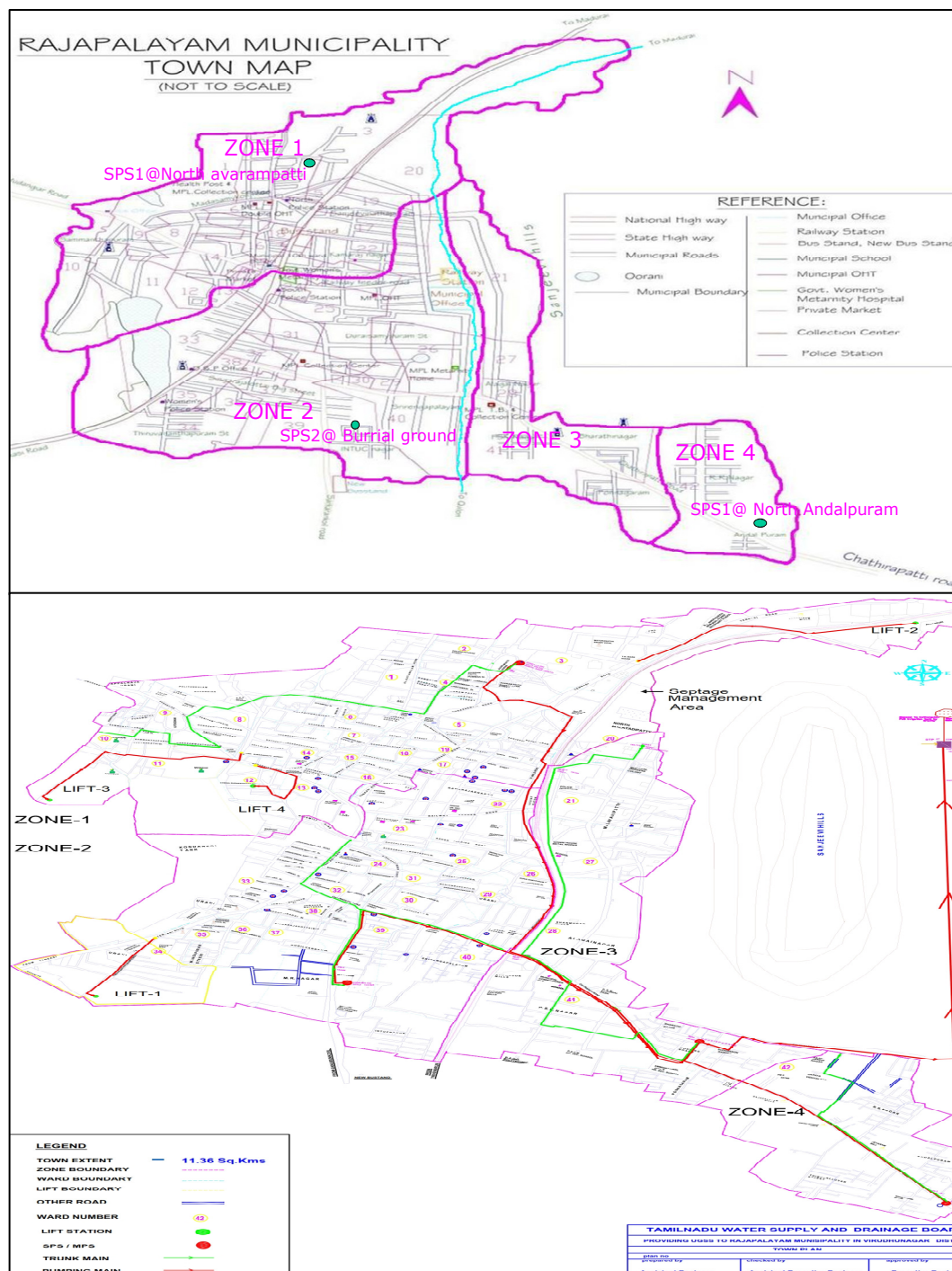
1. The proposed Tamil Nadu Urban Flagship Investment Program (TNUFIP) is aligned to support in the following: (i) urban infrastructure across the state improved and world class cities focusing on universal access to 24x7 water supply services and sanitation facilities including tertiary treatment of sewage to become engines for economic growth developed (Vision 2030, Government of Tamil Nadu, [GOTN]); (ii) five industrial corridors developed (GOTN Vision 2030); (iii) quality of life for all, especially the poor and the disadvantaged improved (Mission Statement and Guidelines, Atal Mission for Rejuvenation and Urban Transformation(AMRUT) Government of India, 2015); (iv) a clean and sustainable environment provided (Smart Cities - Mission Statement and Guidelines, Government of India, 2015). TNUFIP will focus on cities in five priority economic corridors: (i) Chennai-Hosur, (ii) Chennai-Tiruchirapalli, (iii) Coimbatore-Madurai, (iv) Coimbatore-Salem, and (v) Madurai-Thoothukudi. The reform-based component of the program will seek to provide results-based performance incentives to select cities and towns. The program shall also focus on transformative investments in 24X7 water supply, full sanitation coverage smart water management, and urban climate change resilience drawing from the support of various Asian Development Bank (ADB) grant technical assistance. The TNUFIP is envisaged to be structured under three main components: (i) investment in municipal infrastructure namely water supply and sewerage, (ii) municipal reform-based activities, and (iii) technical assistance for design, supervision, program management, reforms, and climate change. TNUFIP will be implemented over an 8-year period beginning in 2018 and will be funded by ADB via its MFF. The impact of the TNUFIP will be improved liveability and resilience in urban areas of economic importance in Tamil Nadu.

2. At present there is no underground sewerage system (UGSS) and sewage treatment facility in Rajapalayam Municipality. The proposed UGSS will cover the entire city of around 11.36 sq. km. (divided into 42 municipal wards and four sewerage zones) and cater to 190,000 population for the intermediate design year of 2035. Proposed subproject component comprises:

- (i) Laying of around 156kilometer (km) of sewer network of DWC/RCC pipes ranging from 200-700 millimeter (mm)dia;
- (ii) Laying of 19 km of pumping mains of 100-700 mm dia;
- (iii) Construction of threesewage pumping stations;
- (iv) Construction of foursewage lift stations;
- (v) Construction of 21.85 MLD sewage treatment plant (STP)

3. This draft Resettlement Plan is prepared for proposed sewerage subprojects in Rajapalayam(Figure 1) and is in line with the resettlement framework prepared for the implementation of social safeguards under TNUFIP. The draft Resettlement Plan will be updated based on detailed measurement surveys based on detailed design, in sections ready for implementation.

Figure 1: Proposed Rajapalayam Underground Sewerage System under Asian Development Bank Financing



II. SCOPE OF LAND ACQUISITION AND RESETTLEMENT

4. Consistent with the subproject selection criteria new construction avoids/minimizes involuntary resettlement impacts. Construction of proposed sewage pumping stations and lift stations will be accommodated on vacant Government lands. There is no permanent/temporary

land acquisition envisaged for implementation of proposed subproject components. Potential temporary resettlement impacts are identified due to rehabilitation and laying of sewer networks. Table 1 provides the details of proposed subprojects in Rajapalayam and anticipated involuntary resettlement impacts.

5. The sewer lines are generally laid in the centre of the road/street; away from water supply and other utility lines to avoid problems in accessibility for future operation and maintenance (O&M). New sewer system will be hence laid within road rights-of-way (ROW) in the centre of the road by cutting black top. In wider roads, like state highway and national highway, divided roads etc¹, sewers will be laid along the edge of the road, but mostly within the black top portion. Laying of sewers either in the middle of the road or at the edge of the road within the black top portion/ROW will not require land acquisition or cause permanent displacement, but will cause temporary access disruptions and possible temporary income loss during construction.

6. All roads/streets in project area were screened through transect walks for any encroachments on black top portion/ROW and detailed surveys were conducted for roads where temporary impacts were identified (December 2017), indicating potential temporary income loss to roadside movable/transitory businesses. These impacts will be verified through detailed measurement surveys based on detailed design prior to implementation. The Resettlement Plan will be updated based on the results of detailed measurement surveys and census and socioeconomic surveys of affected persons. Appendix 1 provides summary of transect walk surveys, which confirm that the impacts of sewer laying in Rajapalayam are temporary. These are non-titled movable /transitory structures within the ROW.

7. In line with the ADB's Safeguard Policy Statement (SPS) 2009, and based on the identified impacts, the Rajapalayam subproject can be classified as Involuntary Resettlement Category "B". Resettlement Plan preparation is required for Rajapalayam subproject components in line with the ADB SPS, 2009 and Resettlement Framework prepared for TNUFIP. This document is a Resettlement Plan for Rajapalayam Underground Sewerage System (UGSS).

8. To further minimize construction impacts, work will be executed during early hours of the day in order to avoid inconveniences to the public as well as traders and vendors. All safety norms would strictly be adhered to depending on the magnitude of work and the sensitivity of the location. Appendix 2 provides sample impact minimization measures template to be followed for pipe laying². The project implementation unit (PIU) will also ensure that all the necessary rules related to safety and security of the public and residents are followed by the contractor. The actual dates of construction schedule with respect to rush hour, festival time, and special business days will be discussed with vendors, squatters, market committee members, and residents, and accordingly construction activities will be planned. After laying pipes the lane/road will be restored to its original condition (including bitumen, cement concrete and cement concrete interlocking tiles as applicable).

¹ As indicated by municipal officials there are no roads with median. However, it was indicated that sewer mains will be laid on either sides of the roads for Madurai - Tenkasi road and PACR road up to Andalpuram.

² This will be updated based on the revised project scope and detailed drawings before project implementation.

Table 1: Proposed Subproject Components in Rajapalayam

[illegible]

Sl. No.	Proposed Subproject Components	Scope of Land Acquisition and Resettlement & Rehabilitation	Summary
		<p>land for SPS construction.^a Demolition of existing structures/sheds and its reconstruction, shifting of entrance gate etc. will be required for the construction of SPS-2. However, no existing graves or related infrastructure will be disturbed except parking sheds as mentioned above. SPS-2 requires a total of 1,632 sqm. area for construction.</p> <p><u>Sewage Pumping Station-4.</u> The proposed SPS-4 is located at VadakkuAndalpuram along state highway and the land belongs to Highway Department (Ward J, Block 8, TS No. 240). The site is currently vacant, adjacent to private properties/buildings on one side and a public city bus stop on the other side. Construction of SPS-4 will require demolition and reconstruction of bus stop slightly away from the site. The Municipality has sent proposal for land transfer/alienation to District Commissioner. SPS-4 requires a total of 720 sqm. area for construction.</p>	government departments, and Reconstruction of common property resource-bus stop
4	<p><u>Lift Stations (LS).</u> Construction of four new lift stations at various locations</p> <p>(Refer Annex 3 for layout drawings, site photos, ownership records and EUPs/NOCs).</p>	<p>For all lift stations, lift well will be constructed on the/along public roads (like manhole) where the sewer ends will terminate. Pumps will be installed in the well, and a control panel box will be installed near the well. Proper fencing will be provided to all LS to safeguard from any damages. Lift stations are proposed at following locations:</p> <p><u>Zone 1, LS-1 at Alahapuri.</u> The site is located along internal road within notified slum near public toilet which is newly constructed. (5m X 5m)</p> <p><u>Zone 1, LS-2 at SamathapuramSeethakathi Street.</u> The site is located within residential area along the road. (10m X 5m)</p> <p><u>Zone 1, LS-3 at Santhoorani.</u> The site is located along the road near public toilet and close to Kondaneri tank water body. (5m X 5m)</p> <p><u>Zone 2, LS-1 at Thiruvananthapuram street.</u> The site is located within residential area along the road. (10m X 5m)</p>	No Involuntary Resettlement/Indigenous Peoples impacts anticipated
5	<p><u>House Service Connections.</u> Provision of 38,586house service connections with inspection chambers</p>	<p>Inspection chambers and house service connections will be provided within individual's property boundary. No LA and R&R envisaged.</p>	No Involuntary Resettlement/Indigenous Peoples impacts anticipated

Sl. No.	Proposed Subproject Components	Scope of Land Acquisition and Resettlement & Rehabilitation	Summary
7	21.85 MLD new STP. Construction of new STP	The new STP will be constructed at Puthupalayam village behind Sanjeev hills within existing solid waste dumping/composting site. The site is located approximately 5km towards east from the municipal limits, within South Venganallir Panchayat. The total land area is around 20.36 acres and the land belongs to Rajapalayam Municipality (S.No.1/282, 29/1, 2, 3, 28). Approach road to STP passes through revenue land which is currently classified as waste land. The land transfer for approach road is initiated.	Confirmation of land ownership for last stretch of approach road for STP site.

CMWSSB = Chennai Metropolitan Water Supply and Sewerage Board, CPCL = Chennai Petroleum Corporation Limited, CPR = Common Property Resource, EUP = enter upon permission, GCC = Greater Chennai Corporation, HR&CE= Hindu Religious & Charitable Endowment, LA = land acquisition, mld = million liters per day, m = meter, NOC = no objection certificate, OHT = overhead tank, ROW = right of way, R&R = resettlement and rehabilitation, SPS = Safeguard Policy Statement, STP = sewage treatment plant, UGT = underground tank

Note: For all CMWSSB/GCC/government lands, PIU will confirm that there are no legacy issues related to acquisition of the sites, i.e., year in which land was acquired/obtained, whether acquired in anticipation of ADB funding, whether all compensation has been paid and accepted, and whether there are any pending legal/other issues. This could be in the form of self-certification by the owner department/GCC/CMWSSB. This will be submitted to ADB through PMU before contract award and start of civil works.

Source: DPRs, CMWSSB and site visits.

^aEarlier Municipality Chairman (elected representative) was from the same community who in consultation with other community members had decided to part away with small portion of their burial ground site for SPS-2 construction considering engineering criteria. Rajapalayam Municipality however needs to get written consent from the community concerned.

Source: Rajapalayam UGSS DPR, consultations with municipal officials and site visits.

III. SOCIOECONOMIC INFORMATION AND PROFILE

9. Transect walks identified a total of 69 affected persons whose business will be temporarily affected during pipe laying, as they carry their activities within/very close to ROW. These businesses are mainly (61%) tea/food/juice related stalls and vegetable/fruit stalls. Around 22% have shop businesses like Electrical, bike workshops, fancy/plastic stores, flour mill etc. while an additional 17% have small/ petty businesses. Some of the surveyed affected persons indicated that they sometimes take rounds in confined areas to sell their items though their place of vending is otherwise stationary/fixed. Eighty five percent of the affected businesses have extended their activities on roads or sit on roads for selling their goods while an additional 12% have movable carts. Only around 3% of affected persons with kiosks may require shifting assistance. Structures that are extended on roads can be easily dismantled.

10. Street vending is quite a common practice in many cities of the state including Rajapalayam and close to 36% of the affected persons indicated that they are doing their business at present location for more than 10 years. An additional 25% indicated that they have this fixed location for more than five years while the remaining 39% said they have moved to their respective places in last 2-5 years.

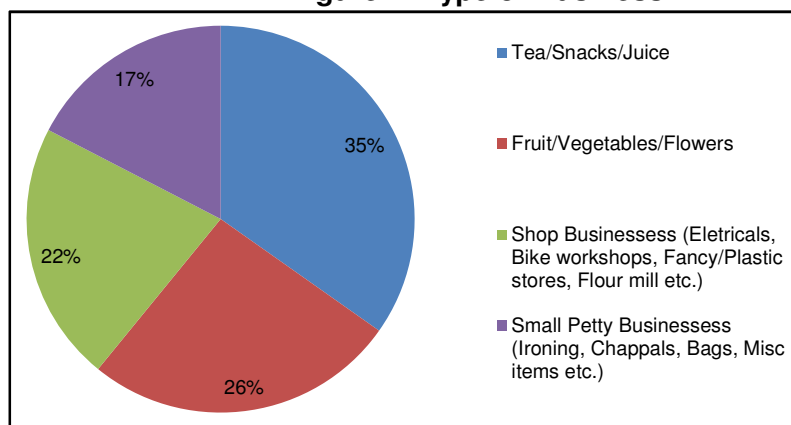
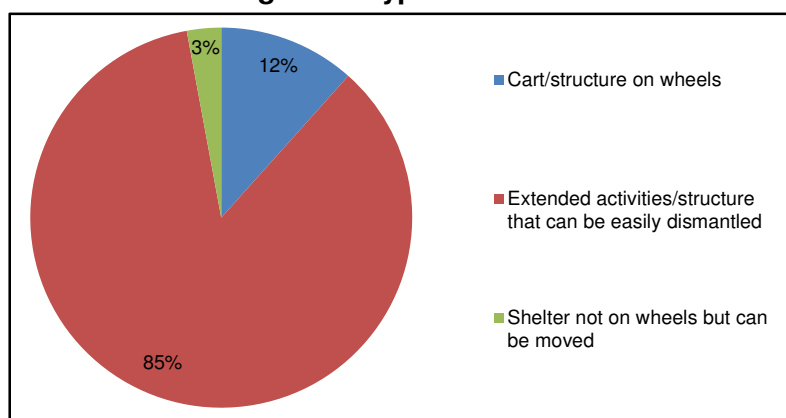
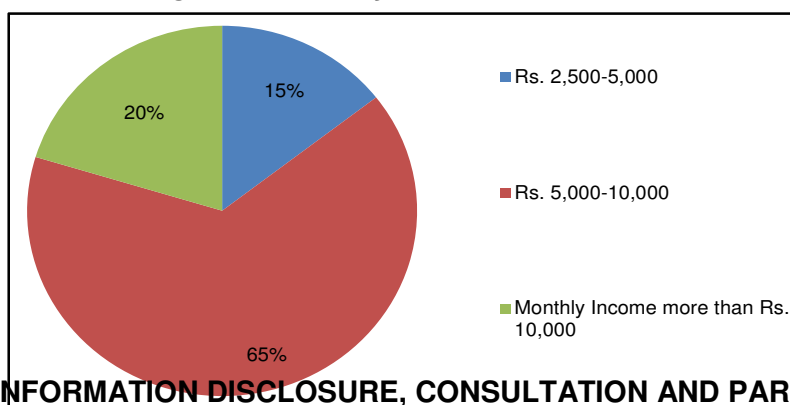
11. In terms of the socioeconomic background, a majority of the potentially affected vendors appear to be poor. About 15% earn monthly income between ₹2,500-5,000 while an additional 65% earn between ₹5,000-10,000. Average monthly income works out at ₹9,022 with minimum at ₹3,000 and maximum at ₹15,000.³ Considering work week of six days (26 days per month), average daily income is estimated at ₹170 for the 11 BPL affected persons and ₹347 for all affected persons. The overall average is lower than the notified minimum wage rate for unskilled category, at ₹528 for all municipalities in the state.

12. Only around 3% affected persons belong to scheduled castes, while the remaining belongs to other backward classes (OBC-97%). No affected person belonging to the scheduled tribe category was identified during resettlement surveys. During site visits it was found that scheduled tribes in Rajapalayam do not show any distinct indigenous characteristics that are different than mainstream society. No women affected persons or women headed households (WHH)⁴ found during the survey. Vulnerable affected persons comprise 43% of the total surveyed affected persons. Households who use common property resource (burial ground and bus stop) at SPS locations are mainly general households from different income categories.

13. This resettlement plan will be updated road/alignment wise based on detailed measurement survey considering detailed design in sections ready for implementation and the revised Resettlement Plan will be submitted to the ADB for approval. A 100% census and socioeconomic survey will be undertaken during detailed measurement survey to register and document the status of affected persons within the subproject impact area. Any temporary impacts or costs incurred by affected persons will be identified through the DMS and compensated at replacement cost, in line with the principles of the Resettlement Framework.

³ As per data published by the Planning Commission, Government of India, in 2011-2012, poverty line in urban Tamil Nadu was ₹993 per capita per month. On adjusting for inflation, this works out to ₹1,406 per capita per month in 2017 or a monthly household income of ₹5,540 for BPL households, considering the average urban household size in the state per Census 2011. Hence, a majority of the identified potentially temporarily impacted persons are estimated to be below poverty line, based on limited data available.

⁴ Household is considered women headed when she is the single bread earner of the family or earn most of the income for the family.

Figure 1: Type of Business**Figure 2: Type of Structure****Figure 3: Monthly Household Income**

IV. INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION

14. Consultation with the primary and secondary stakeholders is an important tool for successful preparation and implementation of resettlement plan. The key stakeholders consulted during sub-project preparation, resettlement plan preparation and implementation, and program implementation include:

- (i) Heads and members of households likely to be affected;
- (ii) program beneficiaries, groups/clusters of affected persons;
- (iii) Local voluntary organizations and community-based organizations (CBOs),
- (iv) Government agencies and departments; and

- (v) Major project stakeholders, such as women, trader's associations, community-based organizations, etc.

15. Types of consultations during project preparatory technical assistance (PPTA) stage are presented in Table 2. These include consultations during baseline surveys to integrate household's preferences into project design. Consultations with potentially affected persons were conducted during transect walks. The concerns expressed mainly included traffic disruptions and temporary impacts on livelihood, including duration of impact (Appendix 3). It was informed to surveyed potential affected persons that appropriate measures will be undertaken during construction to minimize impacts. (including scheduling of activities during the early morning and reducing construction activities during the rush hour). It was also informed that, if despite mitigation measures, there were any temporary impacts on livelihood; these would be compensated in accordance with the resettlement plan's entitlement matrix. Further consultations will also include focus group discussions (FGDs) and structured census surveys parallel to detailed measurement survey in sections ready for implementation before the project implementation. These will be carried out by Construction Management and Supervision Consultant's (CMSC) Social and Resettlement Safeguard Expert (SRSE) who will work closely with PIU Assistant Safeguards Officer (ASO) and PMU SPO. Further consultations will be conducted with the community, who will have to part away with their government allocated graveyard land (partially) at SPS-2 site. Consultations will be conducted to understand the requirements for restoration of sheds at the site which needs to be demolished for SPS construction. Similarly, consultations will be conducted with the surrounding habitants at SPS-4 location for shifting of bus stop at suitable distance. Outcomes of these will be incorporated in updated RP before implementation. Additionally, a citywide stakeholder consultation involving representatives from all stakeholder groups to brief them about the technical details of project and project implementation cycle; project benefits as well as adverse impacts envisaged during construction; environmental and social safeguards, gender inclusion, community participation aspects built into the project etc. is proposed. Minutes of meeting will be added to the updated Resettlement Plan.

16. At this PPTA stage disclosure activities included dissemination/distribution of summary of resettlement framework and resettlement plan in local language to key stakeholders including affected persons. The approved resettlement framework/ resettlement plan (full documents) will also be disclosed on ADB and local government's websites and will be available in key local/state government offices. During the subproject implementation, construction schedules will be informed to all residents (including affected persons) prior to the commencement of pipe laying through signboards. The signboards will be in local language and will include at minimum: (i) section to be affected, (ii) start and end dates, (iii) information on traffic rerouting if any, and (iv) contact information for questions/grievances.

Table 2: Consultation and Disclosure Activities during Project Preparatory Technical Assistance Stage

Activities	Details	Responsible Agency
Preliminary awareness about the project activities (Completed)	City visits and series of meeting with key stakeholders (ULB, TWADB, District Collector, etc., officials)	PPTA team
Baseline surveys (Completed)	Sample household socio-economic surveys to understand baseline infrastructure situation, problems faced in service delivery, household's willingness to get	PPTA team

Activities	Details	Responsible Agency
	connected to new systems and willingness to pay for it	
Profiling of potential affected persons (Completed)	Undertake transect walks and screening of project impact area to identify potential affected persons and record their socio-economic and business profile.	PPTA team
City wide stakeholder consultation	Dissemination of project related technical and other information to representatives of all key stakeholders (at one platform) and disclosure of summary of social safeguard documents in local languages	PPTA team/ relevant government departments

CMWSSB = Chennai Metropolitan Water Supply and Sewerage Board, PPTA = project preparatory technical assistance, TNUIFSL = Tamil Nadu Urban Infrastructure Financial Services Ltd., ULBs = urban local body.

17. Continued involvement of those affected by the sub-project will be ensured. An intensive information dissemination and feedback campaign for affected persons will be conducted by the PIU from the time of resettlement plan preparation to implementation and monitoring. The proceedings of such campaigns shall be documented. All the comments made and concerns raised by the affected persons will be documented in the subproject records and summarized in sub-project monitoring reports.

18. During revised resettlement plan preparation, PIU/PMU will be responsible for issuing various required public notices. For the temporary impacts the date/period of socio-economic surveys will be considered as cut-off date. Cut-off-date for temporary impacts will be communicated to affected persons through CMSC, 2-3 days before the start of survey (and not in much advance) and also by putting up printed information in project affected area at some common advertisement place. Similarly, list of affected persons will be published at common places with contact details of CMSC/PIU officials. The list will be put up area wise and at a time for the entire city. This will avoid affected persons moving into other areas and to identify any duplication of affected persons. CMSC will facilitate affected persons to approach lists in their area and get confirmation on any duplication, missing/absent affected persons.

19. Additionally, draft/final resettlement framework/resettlement plan will be made available in PIU and PMU offices. The resettlement framework and resettlement plan will be disclosed in ADB's website and the PMU websites. Finalized resettlement plans will also be disclosed in ADB's website, PMU websites, and PIU or city websites; and information dissemination, through subproject specific leaflets and public announcements, and consultation will continue throughout program implementation. The project leaflets will be distributed by Governance Improvement and Awareness Consultant (GIAC)/CMSC to the affected communities for their information. A sample project information dissemination leaflet is attached in Appendix 6.

V. GRIEVANCE REDRESS MECHANISM

20. A common grievance redress mechanism (GRM) will be in place to redress social, environmental or any other project related grievances. The GRM described below has been developed in consultation with stakeholders. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable and others are made aware of grievance redress procedures and entitlements per project entitlement matrix, and PMU and concerned PIUs will ensure that their grievances are addressed.

21. Affected persons will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes or through telephone hotlines at accessible locations, by e-mail, by post, or by writing in complaints register in ULB or PIU or implementing agency offices. PIU Safeguards officer will have the responsibility for timely grievance redress on safeguards and gender issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

22. GRM provides an accessible, inclusive, gender-sensitive and culturally appropriate platform for receiving and facilitating resolution of affected persons' grievances related to the project. A two-tier grievance redress mechanism is conceived, one, at project level and another, beyond project level. For the project level GRM, a grievance redress committee (GRC) will be established in PIUs; Safeguards officer and Social and Gender Officer will be responsible for creating awareness among affected communities and help them through the process of grievance redress, recording and registering grievances of non-literate affected persons.

23. GRM aims to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. All grievances – major or minor, will be registered. Documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. PIU will also be responsible for follow-through for each grievance, periodic information dissemination to complainants on the status of their grievance and recording their feedback (satisfaction/dissatisfaction and suggestions).

24. In case of grievances that are immediate and urgent in the perception of the complainant, the contractor, and supervision personnel of the CMSC and PIU will resolve the issue on site, and any issue that is not resolved at this level will be dealt at PIU head level for immediate resolution. Should the PIU fail to resolve any grievance within the stipulated time period, the unresolved grievances will be taken up at ULB level. In the event that certain grievances cannot be resolved even at ULB level, particularly in matters related to land purchase/acquisition, payment of compensation, environmental pollution etc., they will be referred to the district level grievance redress committee (GRC) headed by the District Collector. Any issue which requires higher than district level inter-departmental coordination or grievance redress, will be referred to the state level Steering Committee.

25. GRC will meet every month (if there are pending, registered grievances), determine the merit of each grievance, and resolve grievances within specified time upon receiving the complaint-filing which the grievance will be addressed by the state-level Steering Committee. The Steering Committee will resolve escalated/unresolved grievances received.

26. **Composition of Grievance Redress Committee.** GRC will be headed by the District Collector, and members include: PIU head, Safeguards Officer of PIU, representative of TNPCB, one elected representative/prominent citizen from the area, and a representative of affected community. GRC must have a women member.

27. **State level steering committee** will include Commissioner of Municipal Administration as chair, member include managing directors of Tamil Nadu Urban Infrastructure Financial Services Ltd. (TNUIFSL), Chennai Metropolitan Water Supply and Sewerage Board (CMWSSB), TWAD Board and others as applicable.

28. **Areas of Jurisdiction.** The areas of jurisdiction of the GRC, headed by the District Magistrate will be (i) all locations or sites within the district where subproject facilities are

proposed, or (ii) their areas of influence within the District. The Steering Committee will have jurisdictional authority across the state (i.e., areas of influence of subproject facilities beyond district boundaries, if any).

29. The multi-tier GRM for the project is outlined below (Figure 4), each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required. The GRC will continue to function throughout the project duration. The implementing agencies/ULBs shall issue notifications to establish the respective PIU level grievance redress cells, with details of composition, process of grievance redress to be followed, and time limit for grievance redress at each level.

- (i) **1st level grievance.** The contractor and CMSC supervision personnel and PIU supervision personnel can immediately resolve issues on-site in consultation with each other and will be required to do so within 3 days of receipt of a complaint/grievance.
- (ii) **2nd level grievance.** All grievances that cannot be redressed within 3 days at field/ward level will be brought to the notice of Social Safeguards Officer (SSO) of PIU. PIU will resolve the grievance within 7 days of receipt of compliance/grievance in discussion with the CMSC and the Contractor. PIU SSO will be supported by the CMSC SSS at this stage.
- (iii) **3rd level grievance.** All the grievances that are not addressed by PIU within 7 days of receipt will be brought to the notice of the Town Level Committee (TLC), of which ULB Commissioner will be the Chairperson, and will be assisted by the concerned city level engineers. TLC will meet twice a month and determine the merit of each grievance brought to the committee. The PIU SSO will be responsible to see through the process of redressal of each grievance. The TLC will resolve the grievance within 15 days of receiving the complaint.
- (iv) **4th level grievance.** All grievances that are not addressed by the TLC within 15 days, and which require the District Collector's intervention, will be escalated to the district level GRC, chaired by the District Collector. The district level GRC will have the District Collector as chair, PIU head as Convenor, and Safeguard Officers of the PIU, representative of TNPCB, one elected representative, one prominent person/member of the community, and a representative of affected persons/community as members. At least one member of the GRC will be a woman. The GRC will resolve the grievance within 30 days of registration.
- (v) **5th level grievance.** Any grievance that remains unresolved by the GRC will be escalated to the state level steering committee.

30. The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM. In case of grievance related to land acquisition, resettlement and rehabilitation⁵, the affected persons will have to approach a legal body/court specially proposed under RFCTLARR, 2013; Land Acquisition, Rehabilitation and Resettlement Authority (LARRA).

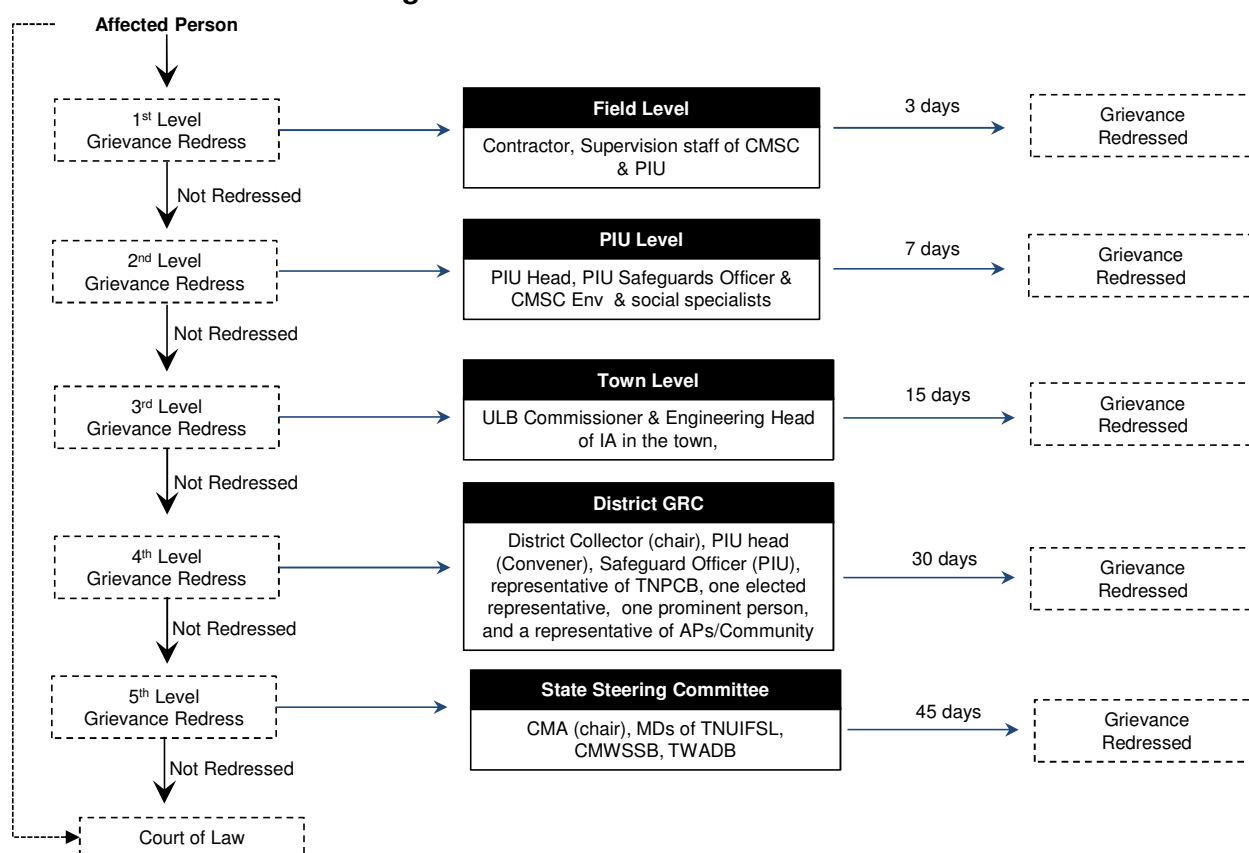
31. In the event that the established GRM is not in a position to resolve the issue, the affected person also can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer at ADB headquarters or the ADB India Resident Mission (INRM). Before submitting a complaint to the Accountability Mechanism, it is necessary that

⁵ The Authority admits grievance only with reference to the land acquisition and R&R issues under the RFCTLARR, 2013.

affected persons make a good faith effort to solve the problem by working with the concerned ADB operations department and/or INRM. Only after doing that, and if they are still dissatisfied, will the Accountability Mechanism consider the complaint eligible for review. The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

32. **Recordkeeping.** Records of all grievances received, including contact details of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date these were put into effect, and final outcome will be kept by PIU (with the support of CMSC) and submitted to PMU.

Figure 4: Grievance Redress Process



33. **Information dissemination methods of the GRM.** The PIU, assisted by CMSC will be responsible for information dissemination to affected persons and general public in the project area on grievance redress mechanism. Public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable and others are made aware of grievance redress procedures and entitlements per this resettlement framework including contact details of officials/members of GRC, where/ how to register grievance, various stages of grievance redress process, time likely to be taken for redress of minor and major grievances, etc. Grievances received and responses provided will be documented and reported back to the affected persons. The number of grievances recorded and resolved and the outcomes will be displayed/disclosed in the PIU, offices, ULB notice boards and on the web, as well as reported

in the semi-annual environmental and social monitoring reports to be submitted to ADB. A Sample Grievance Registration Form has been attached in Appendix 6.

34. **Periodic review and documentation of lessons learned.** The PMU will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the PIU's ability to prevent and address grievances.

35. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by the respective PIU.

VI. LEGAL FRAMEWORK

36. The policy framework and entitlements for the TNUFIP are based on:

- (i) The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (RFCTLARR), 2013 and RFCTLARR GOTN Notified Rules, 2017;
- (ii) Environmental and Social Management Framework (ESMF) of TNUIFSL;
- (iii) ADB's Safeguard Policy Statement (SPS), 2009; and
- (iv) The agreed entitlement matrix and resettlement framework.

37. The salient features of Government and ADB policies are summarized below. The resettlement principles and procedures to be followed for social safeguards under TNUIFP are detailed out in the resettlement framework document. In case of discrepancy between the policies of ADB and the government, gap-filling measures will be adopted to bridge the discrepancies. Core involuntary resettlement principles for the TNUFIP to be followed for each sub-project, including sample subprojects are:

- (i) Screening of the project to identify involuntary resettlement impacts and risks. Minimizing and avoiding land acquisition and resettlement impacts of each subproject by exploring all viable alternative designs;
- (ii) where unavoidable, time-bound resettlement plans be prepared and affected persons will be assisted in improving or at least regaining their pre-program standard of living;
- (iii) full information and close consultations with affected persons including consultation with affected persons on compensation, disclosure of resettlement information to affected persons, and participation of affected persons in planning and implementing subprojects will be ensured; Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner to affected persons and other stakeholders. Disclose the final resettlement plan and other documents such as the monitoring reports to affected persons and other stakeholders;
- (iv) Where the resettlement impacts are unavoidable, the displaced persons should be assisted in improving or at least regaining their standard of living;
- (v) Vulnerable groups comprising below poverty line households, including female-headed households, disabled persons, elderly, women and children, landless, non-titled households with no tenure security, and schedule castes and scheduled tribe households will be given special assistance;
- (vi) payment of compensation to affected persons including non-titled persons (e.g., informal dwellers/squatters, and encroachers) for acquired assets at replacement cost;

- (vii) payment of compensation and resettlement assistance prior to the contractor taking physical acquisition of the land and prior to the commencement of any construction activities;
- (viii) provision of income restoration and rehabilitation; and
- (ix) establishment of appropriate grievance redress mechanisms.

38. A detailed description of each compensation measure and assistance is provided in the EntitlementMatrix attached in resettlement framework while a Rajapalayam subproject specific /applicable entitlement matrix is given in Table 3. Affected persons will be entitled to a combination of compensation measures and resettlement assistance, depending on the nature of ownership rights of lost assets and scope of the impact, including social and economic vulnerability of the affected persons.

VII. ENTITLEMENTS, ASSISTANCE AND BENEFITS

39. Potential temporary economic impacts are identified for Rajapalayam subproject ranging from 20-30 days of construction time for each road stretch of about 500 meters (m). In majority of the roads impacts will be avoided as the sewer network will be laid in the middle of the road. In wider and divided roads where work needs to be undertaken on both sides of the road, impacts can be avoided/minimized by taking construction on one side of the road at a time. In such cases temporarily affected persons will be assisted in moving to the other side of the road and returning their temporary structures to the original location after construction is completed. Where moving is not required, access will be ensured by the contractor through measures prescribed in environmental management plan (EMP). During implementation if more number of affected persons are identified at one place (e.g. vegetable market) then an alternate place in the vicinity will also be identified so that they can continue with their livelihood activities.

40. Potentially affected persons that use movable stalls (Appendix 3) can be shifted to nearby locations if properly informed. Advance notice regarding construction activities, including duration and type of disruption provided to temporarily affected persons once contractor's work plans are finalized, with minimum 7 working days. If required, they will also be assisted to temporarily shift for continued economic activity. For example, they will be assisted to shift to the other side of the road or nearby areas where there is no construction. Ensuring there is no income or access loss during sub-project construction is the responsibility of contractors.

Table 3: Entitlement Matrix⁶

No.	Impact Category	Entitlements	Explanations
Unforeseen Impacts^a			
A	Unforeseen Impacts	Unforeseen impacts encountered during implementation will be addressed in accordance with the principles of this resettlement framework.	-
Temporary Economic Impacts during implementation			
A	Temporary economic impacts	Compensation for loss of income for the duration of impact based on net income worked out as per IT returns	Advance notice provided to temporarily affected persons once contractor's work plans are finalized,

⁶ Any changes required in the Entitlement Matrix pursuant to any Amendments in the LARR 2013 Act and Rules notified by the GoTN will be incorporated with the concurrence of the ADB. All cash allowance in the EM will be revised at the rate of 5% per annum starting from financial year 2019-20.

No.	Impact Category	Entitlements	Explanations
		or based on notified minimum wage rates, whichever is higher.	with minimum 7 working days.
Impacts on Community Assets			
A	Community Assets	Wherever possible the community assets will be relocated/ restored in consultation with community. When the relocation/restoration of the community assets are not feasible, they will be replaced/provided afresh.	-

^a If unanticipated involuntary resettlement impacts are found during implementation, a social impact assessment will be conducted and the resettlement plan updated or a new resettlement plan prepared, in accordance with ADB SPS 2009.

41. If construction activities result in unavoidable livelihood disruption, compensation for lost income based on the net income or as per notified minimum wage rates, whichever is higher will be provided. Vulnerable affected persons will be given priority in project construction employment. Compensation and assistance to temporarily affected persons will be made prior to their shifting from original place of business (if required) and before start of civil works. Since most affected households have moveable stalls, ID cards should be distributed 7 days before compensation. In summary, temporarily affected persons will be provided with:

- (i) Advance notice regarding construction activities, including duration and type of disruption provided to temporarily affected persons once contractor's work plans are finalized, with minimum 7 working days;
- (ii) Contractor's actions to ensure there is no income/access loss consistent with the initial environmental examination. This includes: leaving spaces for access between mounds of soil, providing walkways and metal sheets to maintain access across trenches for people and vehicles where required, increased workforces to finish work in areas with impacts on access, timing of works to reduce disruption during business hours, phased construction schedule and working one segment at a time and one side of the road at a time;
- (iii) Assistance to mobile vendors/hawkers to temporarily shift for continued economic activity. For example, assistance to shift to the other side of the road where there is no construction; and
- (iv) For construction activities involving unavoidable livelihood disruption (temporary income loss), compensation for lost income for the period of disruption.

VIII. RESETTLEMENT BUDGET AND FINANCING PLAN

42. The resettlement budget for Rajapalayam subproject is estimated at ₹9.99 million. The costs are indicative estimates to be confirmed post detailed measurement survey based on detailed design and comprise GRM and consultation costs. Resettlement Plan costs will be confirmed during detailed project preparation/implementation.

Table 4: Resettlement Cost

	Details	No.	Unit Cost	Total Cost (₹)
1	Land Purchase from HR&CE	1689.90	m ²	3,975
				6,717,353

2	Temporary Income Loss				
	Provisional sum for compensation of temporary income loss at notified minimum wage rate ^a for 69 affected persons for 25 days ^b	69	25 days	528	910,800
3	Loss of Common Property Resources		LS		1,000,000
4	Surveys, consultations, grievances and awareness				
	DMS Survey for Resettlement Plan updating ^c		LS		200,000
	Consultation, grievance redress, disclosure ^d		LS		250,000
	Subtotal				9,078,153
	Contingency @ 10%				907,815
	Grand Total (₹)				9,985,968

HR&CE= Hindu Religious & Charitable Endowment, m²= square meter

Note:

^aMinimum wage rate estimated based on:

Weblink: [HTTP://CMS.TN.GOV.IN/SITES/DEFAULT/FILES/GO/LABEMP_E_62_2017_2D_PDF.PDF](http://cms.tn.gov.in/sites/default/files/go/labemp_e_62_2017_2d_pdf.pdf)

^bFor the purpose of budget preparation in the draft resettlement plan, notified minimum wage rate is used, as per the entitlement matrix. Costs in the updated resettlement plan will be based on a comparison of census and socio-economic survey data on income with the prevailing notified minimum wage rate at the time of compensation payment.

^cDetailed measurement surveys (DMS) will be conducted in sections ready for implementation, based on detailed design to confirm impacts.

^dThe allocation for disclosure includes cost of translation of the resettlement plan to Tamil.

43. All land acquisition and resettlement costs will be borne by the government/ULB/PIU. Under TNUFIP, it is suggested that payment will be directly made by PIU to affected persons. The CMSC/GIAC will be involved in facilitating the disbursement process and will facilitate opening bank accounts for the affected persons (both permanent and temporary losses) who do not have bank accounts.

IX. INSTITUTIONAL ARRANGEMENTS AND IMPLEMENTATION SCHEDULE

44. The Municipal Administration and Water Supply Department (MAWS) acting through the TNUFSL will be the state-level executing agency. A program steering committee, headed by Principal Secretary, MAWS, GOTN, will provide overall guidance and strategic directions to the program. A PMU for TNUFIP, headed by the Managing Director, TNUFSL acting as Program Director will be established within TNUFSL for overall management, planning, implementing, monitoring, reporting, and coordinating TNUFIP. The Commissioner of Municipal Administration will act as the Deputy Program Director in the PMU. The project ULBs, represented by respective Municipal Commissioners, will be the implementing agencies for works in cities/towns and will establish PIUs headed by a municipal engineer as full-time Project Manager. For sewerage and water supply works in Chennai, CMWSSB, represented by its Managing Director, will be the implementation agency and establish a PIU headed by a superintending engineer as full-time Project Manager. PIUs will be responsible for overseeing implementation of the various projects on a day-to-day basis. ULBs under the Program with less project implementation capacity, may utilize implementation support from the Tamil Nadu Water and Drainage Board (TWADB) to act as PIU. The Project Managers of the PIUs will be supported by technical, financial, safeguards and administrative staff from a Contract Management and Supervision Consultant (CMSC) recruited by TNUFSL. For the capacity development and incentivized reforms components, Commissionerate of Municipal Administration (CMA) acting through its Commissioner, will be responsible for carrying out these activities and establish a PIU.

45. A Program Steering Committee, headed by Principal Secretary, MAWS, and Members comprises of: (i) Managing Director, TNUFSL (Convener); (ii) Commissioner of Municipal Administration; (iii) Managing Director, CMWSSB; (iv) Managing Director, TWADB; and (v) Managing Director, TUFIDCO.

46. **Project Management Unit.** PMU will monitor the Project and have overall responsibility for ensuring adoption and compliance of resettlement framework and ADBs SPS. Additionally, PMU will monitor PIUs for: (i) identifying and preparing sub-projects; (ii) reviewing resettlement plans prepared by PIU/ULB; (iii) ensure adoption and compliance of resettlement framework in land acquisition and other safeguards; (iv) guide in awareness campaigns and participation programs; (v) organize and operate the program performance monitoring system; (vi) prepare and submit timely reports to ADB; and (vii) design and organize capacity building programs. PMU will be assisted by CMSC in managing and guiding the overall implementation of the Program. SPO of PMU will responsible for all land acquisition and resettlement matters from PMU side. PMU SPO will perform responsibilities like: (i) addressing social safeguards issues; (ii) implementing the resettlement framework; (iii) report to Projects Head with respect to land acquisition and resettlement plan implementation in the subprojects; (iv) monitoring physical and financial progress on land acquisition activities and updating the PMU on the same; (v) monitoring implementation of safeguards plans (resettlement plan); (vi) guiding the PIUs as and when necessary; and (vii) endorsing and submitting periodic monitoring reports.⁷

47. **Project Implementation Unit.**⁸ PIUs will be established in each of the participating ULBs within their structure or at TWADB and in CMWSSB. For Rajapalayam UGSS subproject PIU will be established at ULB supported by CMSC. PIU ASO will assist PMU SPO in implementation of the social safeguards at the PIU level. The PIUs will be responsible for implementation of the resettlement plans. PIUs will undertake internal monitoring and supervision and record observations throughout the project period to ensure that the safeguards and mitigation measures are provided as intended. PIUs will be responsible for: (i) conduct briefing to contractors on safeguards requirements including GRM; (ii) implementing and monitoring safeguards compliance activities, public relations activities, gender mainstreaming activities, and community participation activities; (iii) coordinating with district administration and GIAC for land acquisition and R&R aspects and addressing any problems and/or delays; (iv) monitoring physical and financial progress on land acquisition and R&R activities; (v) organizing monthly meetings with the PIU to review the progress on R&R; and (vi) share all reports relating to land acquisition, alienation, R&R activities etc. and status to PMU. Further details on agencies responsible for resettlement plan activities are in **Error! Reference source not found..**

48. **Construction, Management and Supervision Consultant.** The implementing agency will be assisted by a CMSC social and resettlement safeguards expert (SRSE). The SRSE will (i) based on final designs, carry out census and socioeconomic surveys/verification surveys for the affected people and update resettlement plan in line with the TNUFIP resettlement

⁷ The monitoring report will focus on the progress of implementation of the IEE/EIA and EARF, resettlement plan/resettlement framework and IPP/IPF, issues encountered and measures adopted, follow-up actions required, if any, as well as the status of compliance with subproject selection criteria and relevant loan covenants.

⁸ If the subproject triggers new LARR, PIU will facilitate land acquisition through District Collector and will provide all details of land acquisition to CMSC SSE/PMU. CMSC SSE will incorporate the same in Resettlement Plan and check its compliance with resettlement framework/ADB SPS 2009 to make necessary additions (if any). PIU will bear the cost of any deviations in the compensation etc. to comply with Resettlement Framework/ADB SPS 2009. Government procedures under land acquisition act can run parallel even though under ADB project required surveys/preparation of RP will be undertaken. ADB project need to wait for the outcomes of government procedures to finalize the compensation and disbursement of payments.

framework; (ii) identify requirement for any enter upon permissions(EUPs)/No Objection Certificates (NOCs) for sub-project sites and assist PIUs in obtaining the same prior to start of civil works. Prepare any additional safeguard documentation, if required, such as due diligence reports; (iii) assist PIU in day-to-day implementation of resettlement plan activities and ensure contractors comply with conditions of resettlement framework/resettlementplan; (iv) take proactive action to anticipate and avoid delays in implementation, and ensure gender equality and social inclusion during implementation; (v) assist PIU in conducting public consultation and disclosure activities; (vi) Assist PIU in preparing periodic social safeguard monitoring reports as per Project Administration Manual requirements; (vii) under guidance of GIAC, assist PIU in establishing a system and indicators, focusing on gender and vulnerable households, to monitor social safeguards including GRM activities; (viii) support GIAC in conducting training focused on involuntary resettlement safeguards implementation capacity of the PIUs; and (ix) assistance to PIU/PMU in any other social safeguard related tasks.

49. **Governance Improvement and Awareness Consultants (GIAC).** The scope of service will include, but not be restricted to, implementation, monitoring and reporting of the community awareness and participation plan (CAPP); gender action plan, and monitor and guide resettlement plan implementation and lead involuntary resettlement trainings. Specific tasks related to social safeguards include: (i) monitor and guide PIUs on Resettlement Plan implementation, with particular reference to significant impacts; (ii) lead involuntary resettlement training and capacity building on involuntary resettlement/ indigenous people safeguards to project PIUs and CMA; (iii) guide PIUs to set up grievance redress mechanisms, record keeping and feedback mechanisms; and (iv) guide PIUs in keeping detailed records of progress and establishing monitoring and reporting systems for resettlement. GIAC will also provide guidance to PIUs on specific requirements for indigenous peoples planning implementation, if Safeguard Requirements 3 is triggered.

50. To build the institutional capacity for resettlement plan preparation and implementation, following key training activities will be undertaken (Table 55). The cost of trainings for all project cities and staff will be borne by Project's capacity building program by PMU. The detailed cost and specific modules will be customized for the available skill set after assessing the capabilities of the target participants and the requirements of the project.

Table 5: Indicative Training Needs Assessment

Description	Target Participants and Venue
1. Introduction and Sensitization to Social/Involuntary Resettlement/Indigenous Peoples Safeguards (1 day) - ADB Safeguards Policy Statement - Government of India and Tamil Nadu applicable social safeguard acts - Incorporation of social/resettlement components under EMP	All staff and consultants involved in the project At PMU, Chennai First year of the launch of TNUFIP.

Description	Target Participants and Venue
into the project design and contracts - Monitoring, reporting and corrective action planning	
2. Resettlement Plan implementation (2 days; 2 times during implementation with interval of 1 year in-between) - Roles and responsibilities - Resettlement Plan components and stages in implementation - Construction schedules and timelines - Public relations - Consultations - Grievance redress - Monitoring and corrective action planning - Reporting and disclosure - Timely documentation	All staff and consultants involved in the subproject All contractors prior to award of contract At each PIU
3. Experiences and best practices sharing (1 day) - Experiences on Resettlement Plan implementation - Issues and challenges - Best practices followed	All staff and consultants involved in the project All contractors All consultants At PMU Chennai

ADB = Asian Development Bank, NGO = nongovernment organization, PIU = project implementation unit, PMU = project management unit, TNUFIP = Tamil Nadu Urban Flagship Investment Program

Table 6: Institutional Roles and Responsibilities

Activity	Responsible Agency
Subproject Initiation Stage	
Finalization of sites for subprojects	PIU/CMWSSB
Disclosure of proposed land acquisition and subproject details by issuing Public Notice	PIU/CMWSSB
Meetings at community/household level with affected persons	PIU/CMWSSB/CMSC
Resettlement Plan Preparation and Updating Stage	
Conducting Census of all affected persons	PIU/CMWSSB
Conducting FGDs/meetings/workshops	PIU/ CMWSSB
Computation of replacement values of land/properties proposed for acquisition and for associated assets	PIU/ CMWSSB and as per RFCTLARR 2013 for Land Acquisition
Categorization of affected persons for finalizing entitlements	PIU/CMWSSB
Formulating compensation and rehabilitation measures	PIU/CMWSSB
Conducting discussions/meetings/workshops with affected persons and other stakeholders	PIU/CMWSSB
Fixing compensation for land/property with titleholders	As per RFCTLARR 2013 for land acquisition
Finalizing entitlements and rehabilitation packages	PIU/CMWSSB
Disclosure of resettlement plan	PIU/CMWSSB
Approval of resettlement plan	PMU/ ADB
Sale deed execution and payment	PIU/CMWSSB
Taking possession of land	PIU/CMWSSB
Resettlement plan Implementation Stage	
Implementation of proposed rehabilitation measures	PIU/CMWSSB/CMSC
Consultations with affected persons during rehabilitation activities	PIU/CMWSSB/CMSC
Grievances redressal	PIU/ GRC/ PMU/ CMSC
Internal monitoring	PMU / PIU

ADB = Asian Development Bank, CMSC = construction, management, and supervision consultant, CMWSSB = Chennai Metro Water Supply and Sewerage Board, FGD =focus group discussion, GRC = grievance redress

committee, PIU = project implementation unit, PMU =project management unit, RFCTLARR = The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013

51. **Implementation of RP.** All proposed subproject utility sites will be secured prior to the contract award and start of civil works. Prior the contract award, for all municipal/government lands, PIU will confirm that there are no legacy issues related to acquisition of the sites (i.e., year in which land was acquired/obtained, whether acquired in anticipation of ADB funding, whether all compensation has been paid and accepted, and whether there are any pending legal/other issues). This could be in the form of self-certification by the owner department/municipality. This will be submitted to ADB through PMU before contract award and start of civil works. RP will also be disclosed in English and its Executive Summary in Tamil prior to contract award.

Table 7: Schedule of Resettlement Implementation

	2017	2018		2019	2020	2021	2022	2023
	Q4	H1	H2					
Setting up of PIUs								
Appointment of CMSC								
Appointment of GIAC								
Setting up of project level GRM								
Awareness generation among affected persons on entitlements, impact avoidance and mitigation measures to be implemented by the contractor								
Conduct detailed measurement surveys, census surveys and issuance of ID cards in sections ready for construction								
Identify Vulnerable affected persons, if any*								
Update draft Due Diligence Report								
Update draft Resettlement Plan to reflect surveys, consultations, design changes, and due diligence results								
Consultations and disclosure								
Review and approval of updated Resettlement Plan (PMU and ADB)								
Training/capacity building of PMU and PIU safeguards officers, engineers and other staff, DSISC supervision staff and contractor's staff								
Payment of compensation								
Handover of sites and alignments to contractors								
Start of civil works								
Internal monitoring, including surveys of affected persons on entitlements, satisfaction surveys								
Repair/reconstruction of affected facilities, structures, utilities, if any				Immediately, in consultation with other departments, as required				

ADB = Asian Development Bank, GIAC = government improvement and awareness consultant, GRC = grievance redress committee, PIU = project implementation unit, PMU = project management unit, CMSC = construction, management, and supervision consultant.

* The census will be the cut-off date for non-titled affected persons. For titled affected persons, the cut-off date is the date Declaration.

** The resettlement plan will be updated based on final detailed design and affected person census and surveys.

*** Endorsement and disclosure of finalized resettlement plans consistent with the resettlement framework to be undertaken.

X. MONITORING AND REPORTING

52. Resettlement plan implementation will be closely monitored by the PMU. PIU will prepare monthly progress reports on implementation of resettlement plan and submit to PMU, documenting actual achievements against targets fixed and identifying reasons for shortfalls, if any. These reports will feed into the overall monitoring reports for the TNUFIP which will be generated every quarter for the first year of implementation and bi-annually thereafter. Details to be covered under internal monitoring are elaborated in resettlement framework.

POTENTIAL TEMPORARY IMPACTS

Sl.No.	Type of Business	Years in Business at Surveyed Place	Type of Structure	Caste Category	WHH	Monthly Income
1	Tea Stall	2	No structure, on road	OBC	-	10,000
2	Tea Stall	20	No structure, on road	OBC	-	15,000
3	Petty Shop	15	No structure, on road	OBC	-	6,000
4	Chicken Stall	5	No structure, on road	OBC	-	9,000
5	Tea Stall	10	No structure, on road	OBC	-	9,000
6	Flower Stall	16	No structure, on road	OBC	-	6,000
7	Flower Stall	15	No structure, on road	OBC	-	3,000
8	Tea and Sweet stall	4	No structure, on road	OBC	-	9,000
9	Petty Shop	3	No structure, on road	OBC	-	10,000
10	Marbles	15	No structure, on road	OBC	-	10,000
11	Vegetable Shop	13	No structure, on road	OBC	-	9,000
12	Electricals	25	No structure, on road	OBC	-	10,000
13	Electricals	10	No structure, on road	OBC	-	8,000
14	Provision Store	35	No structure, on road	OBC	-	12,000
15	Sweets Stall	10	No structure, on road	OBC	-	10,000
16	Electricals	1	No structure, on road	OBC	-	10,000
17	Cycle Shop	40	No structure, on road	OBC	-	4,500
18	Tea Stall	5	No structure, on road	OBC	-	15,000
19	Fancy Store	60	No structure, on road	OBC	-	3,000
20	Flower shop	2	No structure, on road	OBC	-	6,000
21	Petty Shop	15	No structure, on road	OBC	-	9,000
22	Petty Shop	10	No structure, on road	OBC	-	10,000
23	Flower Shop	2	No structure, on road	OBC	-	15,000
24	Fruits Stall	20	No structure, on road	OBC	-	9,000
25	Petty Shop	10	No structure, on road	OBC	-	9,000
26	Sweets Stall	50	No structure, on road	OBC	-	15,000
27	Cool Drinks Stall	10	No structure, on road	OBC	-	9,000
28	Fruits Stall	10	No structure, on road	OBC	-	9,000
29	Stationery Shop	50	No structure, on road	OBC	-	15,000
30	Stationery Shop	45	No structure, on road	OBC	-	10,000
31	Bag Store	2	No structure, on road	OBC	-	9,000
32	Fruits Shop	2	Movable Cart	OBC	-	12,000
33	Fruits Shop	15	Movable Cart	OBC	-	15,000
34	Fruits Shop	10	Movable Cart	OBC	-	10,000
35	Plastic Store	1	No structure, on road	OBC	-	10,000
36	Tea Stall	2	No structure, on road	OBC	-	9,000
37	Tea Stall	5	No structure, on road	OBC	-	3,000
38	Fast Food	1	No structure, on road	OBC	-	6,000
39	Flower	20	No structure, on road	OBC	-	9,000
40	Flower	35	No structure, on road	OBC	-	4,500
41	Pooja Store	10	No structure, on road	OBC	-	6,000
42	Tea Stall	40	No structure, on road	OBC	-	15,000
43	Fruits Shop	20	No structure, on road	OBC	-	6,000

Sl.No.	Type of Business	Years in Business at Surveyed Place	Type of Structure	Caste Category	WHH	Monthly Income
44	Flower	20	No structure, on road	OBC	-	9,000
45	Fruits shop	20	No structure, on road	OBC	-	15,000
46	Tea stall	4	No structure, on road	OBC	-	4,000
47	Chappel Store	30	No structure, on road	OBC	-	15,000
48	Tea Stall	4	No structure, on road	OBC	-	15,000
49	Banana Fruits	15	Movable Cart	OBC	-	6,000
50	Petty Shop	30	Kiosk	SC	-	4,000
51	Fruits shop	1	Movable Cart	OBC	-	4,500
52	Tea shop	10	Kiosk	OBC	-	6,000
53	Snacks	22	Movable Cart	OBC	-	9,000
54	Snacks	15	Movable Cart	OBC	-	6,000
55	Snacks, Soup	4	No structure, on road	OBC	-	5,000
56	Chappel shop	10	No structure, on road	OBC	-	9,000
57	Flour Mill	25	No structure, on road	OBC	-	15,000
58	Petty Shop	20	No structure, on road	OBC	-	9,000
59	Petty Shop	3	No structure, on road	OBC	-	6,000
60	Bike Workshop	14	No structure, on road	SC	-	10,000
61	Tyre Shop	5	No structure, on road	OBC	-	10,000
62	Mutton stall	8	No structure, on road	OBC	-	15,000
63	Bike Workshop	4	No structure, on road	OBC	-	6,000
64	Tiffin Center	1	No structure, on road	OBC	-	3,000
65	Snacks Stall	4	No structure, on road	OBC	-	9,000
66	Ironing Shop	1	Movable Cart	OBC	-	9,000
67	Tea Stall	2	No structure, on road	OBC	-	6,000
68	Snacks Stall	1	No structure, on road	OBC	-	9,000
69	Fruits Shop	1	No structure, on road	OBC	-	9,000

WHH = women headed household.

Source: Transect walk surveys, December 2017.

SAFETY MEASURES FOR PIPELAYING–SAMPLE TEMPLATE

Type of Road	Average width (m)	Max. Pipe dia (mm)	Max. width of actual excavation (mm)	Method of excavation	Working Width from One Edge (m)	Length of single working stretch (m)	Method of Traffic Management	Remarks
Bituminous	5	300	700	Mechanical (mini digger)	2	200	Flagmen at both ends plus no parking sign for 100m on either end	Night time working may be opted at busy sections with prior permission, stake holder consultation and noise control measures.
	6	-do-	-do-	-do-	-do-	-do-	-do-	-do-
	7.5	-do-	-do-	-do-	-do-	-do-	-do-	-do-
Concrete	2	100	250	Manual	0.5	50	Flagmen at both ends. Only pedestrian traffic will be allowed.	-do-
	3	100	250	Manual	1	50	-do-	-do-
	4	150	350	Manual	1	100	Flagmen at both ends. Pedestrian traffic can be allowed during works. Vehicles will be allowed after day's work by covering the trench with steel plates.	-do-
	5	150	350	Mechanical	2	200	Flagmen at both ends plus no parking sign for 100m on either end	-do-
	6	200	500	Mechanical	2	200	-do-	-do-
Tiles	2	50	150	Manual	0.5	50	Flagmen at both ends. Only pedestrian traffic will be allowed.	-do-
	3	100	250	Manual	0.5	50	-do-	-do-
Earthen road	1	50	150	Manual	0.5	50	Controlled by general operative. Only pedestrian traffic will be allowed.	
	2	50	150	Manual	0.5	50	-do-	

Notes:

- (i) Works will be carried out with due intimation to ULB/PWD and after stakeholder consultations
- (ii) All service providers (electricity, telecom, OFC, cable TV, gas etc.) shall be notified and consulted well in advance to identify bottlenecks and possible solutions.
- (iii) Reinstatement will be carried out in two phases – temporary and final.
- (iv) Special festival, business (local bazar) etc. days will be strictly followed and works causing disturbance will not be carried out on those days.
- (v) No drainage channel shall be disturbed/stopped during construction works. Any drain affected by construction works shall be set right as early as possible and definitely before onset of monsoon.
- (vi) The pedestrian area shall be always kept free from debris / trip hazard
- (vii) Environmental Management Plan (EMP) shall be strictly followed for all works and also dealing with any asbestos cement pipes.
- (viii) Land contamination, if encountered, shall be immediately brought to the notice of the PIU/PMU and remedial measures shall be taken as advised. Disposal of contaminated earth shall be as advised by the PIU/PMU experts.
- (ix) Night time work, if any, shall be carried out after due authorization with adequate safety and security measures. Acoustic hood shall be used on equipment to reduce noise pollution.

SITE VISITS AND CONSULTATIONS **SITE PHOTOS – RAJAPALAYAM**

	
<p>Zone 1, SPS-1 at Vadakku Avarampatti</p>	
	
<p>Zone 2, SPS-2 at Sankaran Kovil Road, Burial Ground</p>	
	
<p>Zone 4, SPS-4 at Vadakku Andalpuram, along Highway</p>	
	
<p>Zone 1, LS-1 at Alahapuri</p>	<p>Zone 1, LS-2 at Samathapuram Seethakathi Street</p>

SITE PHOTOS – RAJAPALAYAM



Zone 1, LS-3 at Santhoorani



Zone 2, LS-1 at Thiruvananthapuram street








STP at Pudupalayam village



STP approach road, left side (ownership not clear), right side revenue land

Consultations during Transect Walks, December 2017

PPTA Team and municipal officials informed about: (i) Issues related to open defecation, disposal of sewage and wastewater into roadside drains eventually polluting the natural streams and rivers; its health impacts; (ii) Need for comprehensive underground drainage system in the city; (iii) Area covered by the project; (iv) Disturbance in traffic movement and to businesses during construction work; (v) Assistance will be provided in continuing affected businesses at different location; (vi) No structure loss; (vi) Compensation for lost income, if any.

Location	No. of Participants	Topics Discussed	Issues Raised
FGD-1 Madurai to Tenkasi Road (Ward No: 17)	Total=8 M=8 F=0 	Participants indicated that this part of the road stretch is sometimes used for slaughtering of animals and this needs to be stopped. It will be a welcome move if these activities can be removed or shifted due to proposed subproject. Affected people are doing their businesses at this place from long time (all encroachers).	Ready to shift/move to nearby location if indicated in advance.
FGD-2 Madurai to Tenkasi Road (Ward No: 16)	Total=5 M=0 F=5 	All the affected people at this location are recently displaced due to some other municipal activity. They were not ready to move again permanently to other location which can affect their business.	Expressed concern over relocation. Indicated they should be well informed and consulted before relocation places are identified. Officials indicated that they will avoid further relocation and work can be done during off business hours. If temporary relocation is unavoidable, they will be assisted to new location and brought back and provided with financial assistance for disruptions as per the RF.
FGD-3 Madurai to Tenkasi Road (Ward No: 14)	Total=7 M=0 F=5 	All affected people at this location are running their businesses from a long time and have their houses also close by. Hence, they were hesitant to move far from this place.	Expressed willingness to shift if the project requires but not very far, as they may face commuting problems. This is the only business they have so indicated that municipality should inform much in advance about the construction work and any likely shifting. Advance notice will be provided and work will be carried out during off business hours
FGD-4 Madurai to Tenkasi Road (Ward No: 33 and South Police Station Opposite)	Total=14, M=14, F=0 	Some of the affected people at this location indicated that they have taken loan and it will pose problems to them if their business is affected, even temporarily. They were ready to shift but at suitable location where they can continue with their economic activities without any loss.	Expressed concern over changing location as not ready to bear losses due to temporary shift. Officials indicated that any income loss will be compensated for the disruption period and they will be assisted for relocation if it is unavoidable.
FGD-5 PACR Road (Ward No: 40)	Total=6 M=6 F=0 	Due to widening of road there is a heavy traffic on this road and some of the businesses have shifted considering risk factors associated with traffic. Affected people at this location are ready to shift but do not know where. Some people have taken loan and have concerns over shifting the place which can affect their income.	Indicated willingness to shift to suitable location.

Potential Impacts – Rajapalayam⁹



⁹ Mobile hawkers (having carts with wheels) will not be affected. Some structures including wares on display, will require assistance for shifting



Note: The DMS survey during detailed design will confirm whether any of the potential impacts identified can be avoided, whether there are any additional temporary impacts and how many will require shifting assistance.

LAND RECORDS

Left Station 1

RAJAPALAYAM MUNICIPALITY



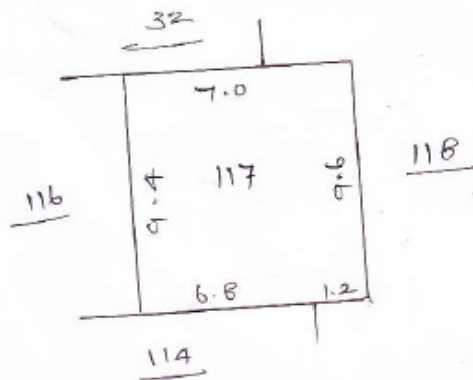
EXTRACT FROM THE RECORDS OF MEASUREMENTS FOR SURVEY
RAJAPALAYAM TOWN

C.A. No. :

TOWN SURVEY WARD : H

BLOCK No. : 19

TOWN SURVEY No. : 117



Town Surveyor
Rajapalayam Municipality

Not to Scale

Per Commissioner
Rajapalayam Municipality

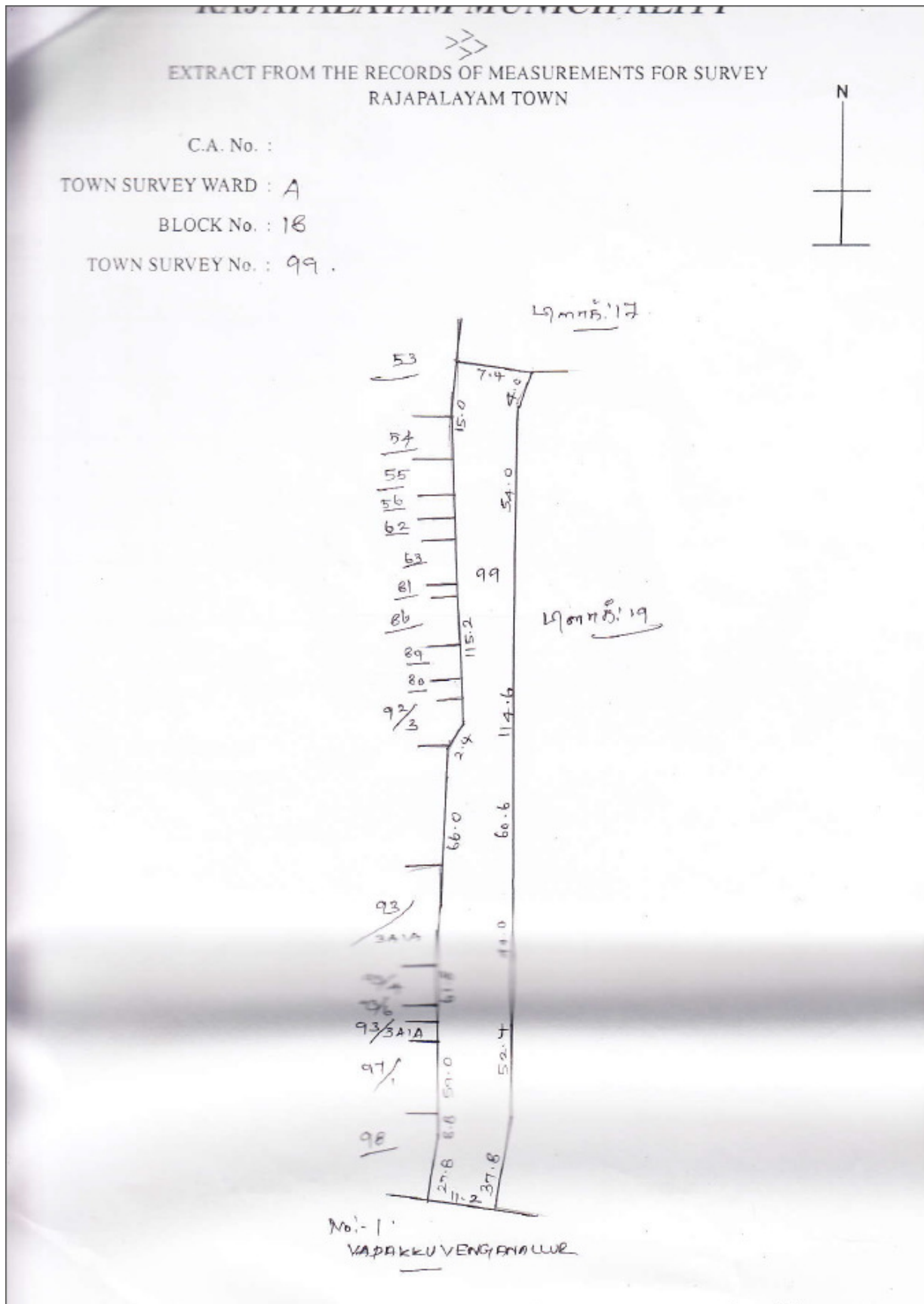
உவுண் சர்வே ரீஜிஸ்டர் (ந

பெயர் உவுண் சர்வே வார்டு..... **H**பிளாக் எண்..... **19** **117** CA. No.

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நகர சார் ஆய்வாளர்
இராஜபாளையம் நகராட்சி

ஆணையாளர்
இராஜபாளையம் நகராட்சி



டவுண் சர்வே ரிஜிஸ்டர் (நகல்)

டவுண் சர்வே வார்டு..... A பிளாக் எண்..... 18 T.S. No. 99. CA. No.

சர்வே பீட்டு நம்பர்	சர்வே பீட்டு	சப் டிவிஷன்	பழைய சர்வே நம்பரும் லைட்டரும்	முனிசிபல் சதுவ எண்.	சர்க்கார் மிடா ஜன்தாஜி இனாம்	பஞ்சை, நஞ்சை தீர்வை பாதாது புறம்போக்கு மனை	பாப்ச்சலாதாரமும் வகுப்பும்	இரு போவமானால் காமரோபரிஷன் டிரூட்டு மண்ணின் தரமும் தினுசும்	தரம்	ஹெக்டேர் ஒன்று டிரூட்டு	டவுண் சர்வே வில்லீரணம் ச.மீ.	தீர்வை		பட்டா அல்லது இனாம் பைடில் பீட்டு நம்பரும் ரிஜிஸ்டரில் தாக்கலானவர் பெயரும்		நிலம் எவ்விதம் உபயோகப்படுத்தி	ஷரா	
												முனிசிபல் ரிஜிஸ்டர்	சர்க்கார்	முனிசிபல் ரிஜிஸ்டர்	அபங்கல்			
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நகர சார் ஆய்வாளர்
இராஜபாளையம் நகராட்சி

ஆணையாளர்
இராஜபாளையம் நகராட்சி

Lift Station - 1

RAJAPALAYAM MUNICIPALITY

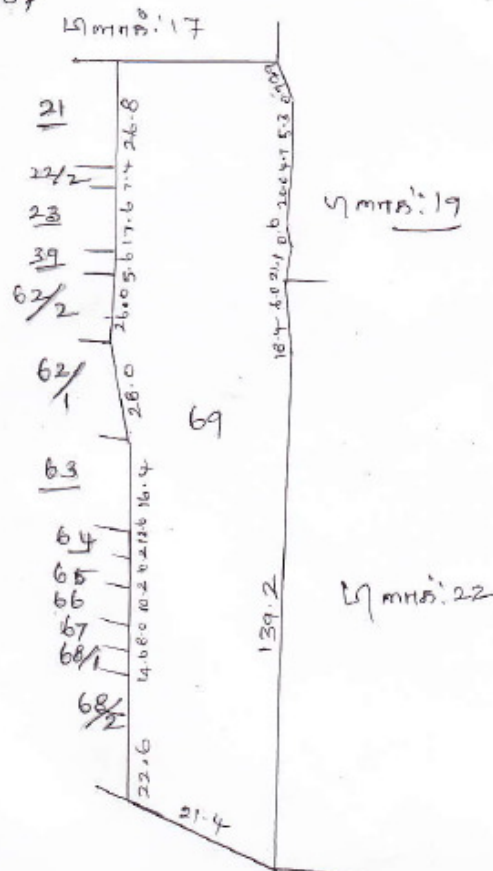
EXTRACT FROM THE RECORDS OF MEASUREMENTS FOR SURVEY
RAJAPALAYAM TOWN

C.A. No. :

TOWN SURVEY WARD : E

BLOCK No. : 18

TOWN SURVEY No. : 69



Y: No: 22

KADAMBANKULAM

Town Surveyor
Rajapalayam Municipality

Not to Scale

Commissioner
Rajapalayam Municipality

RAJAPALAYAM MUNICIPALITY

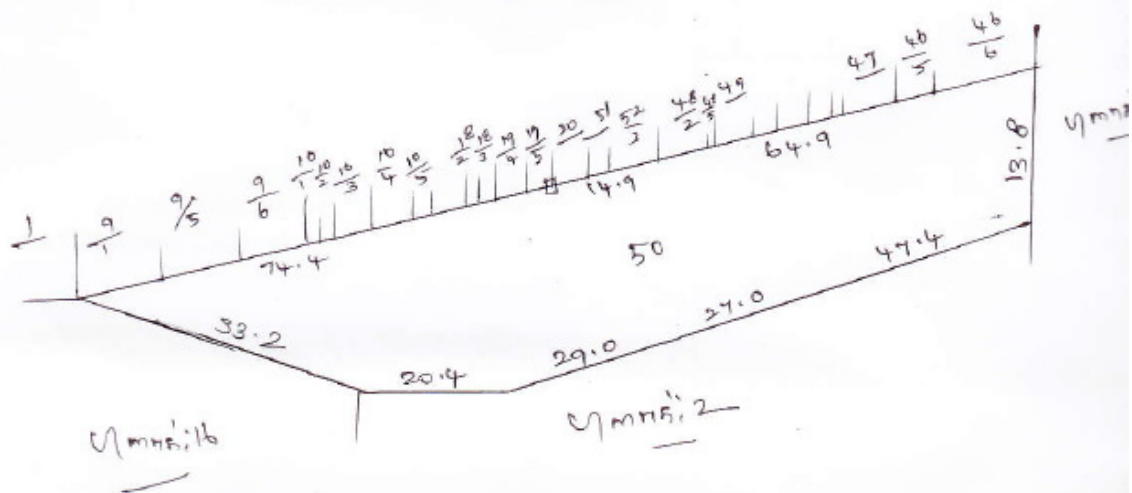
EXTRACT FROM THE RECORDS OF MEASUREMENTS FOR SURVEY
RAJAPALAYAM TOWN

C.A. No. :

TOWN SURVEY WARD : D

BLOCK No. : 1

TOWN SURVEY No. : 50



[Signature]
Town Surveyor
Rajapalayam Municipality

Not to Scale

[Signature]
Commissioner
Rajapalayam Municipality

டவுண் சர்வே ரிஜிஸ்டர்

இராஜபாளையம் டவுண் சர்வே வார்டு.....

7

பிளாக் எண்:.....

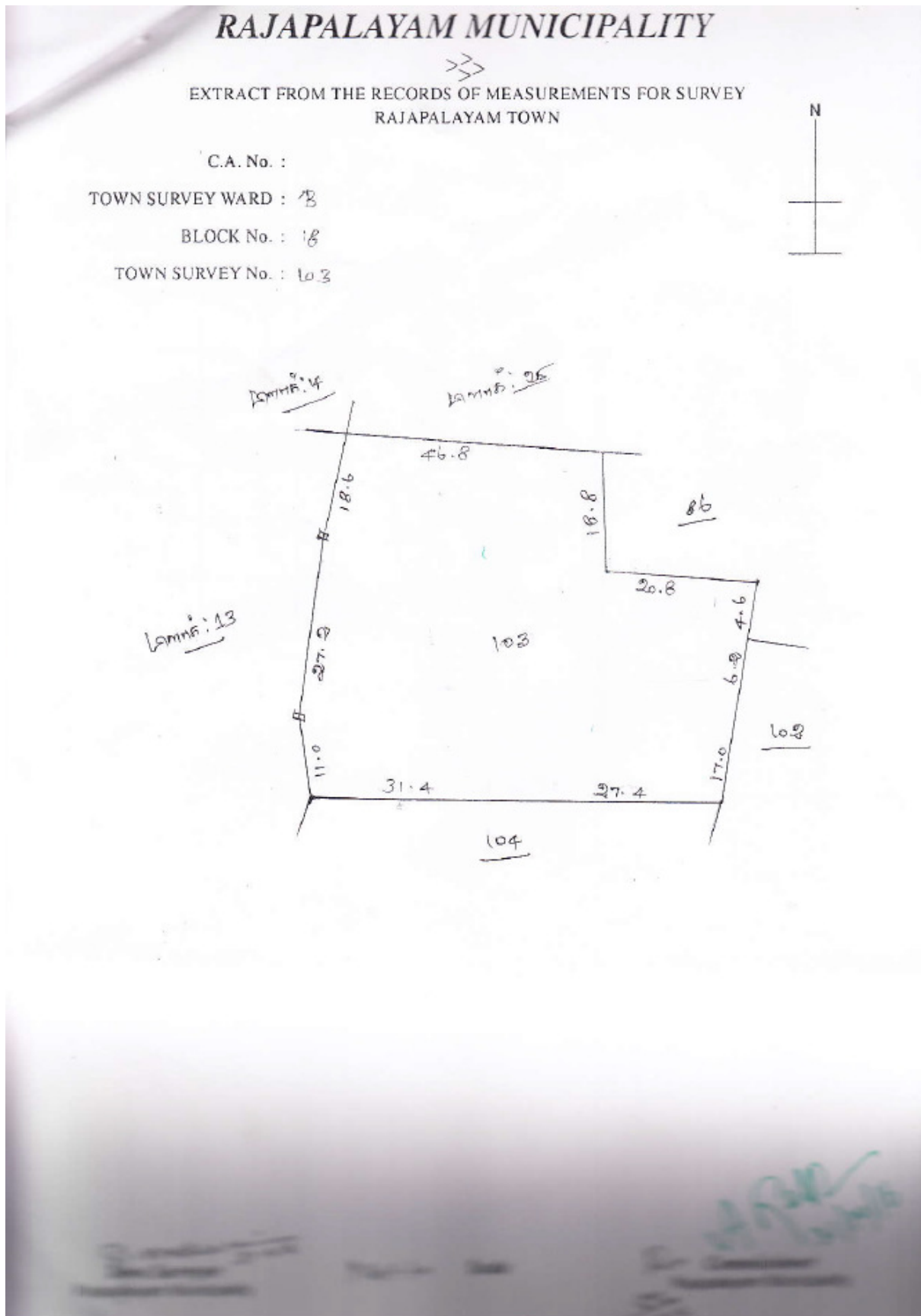
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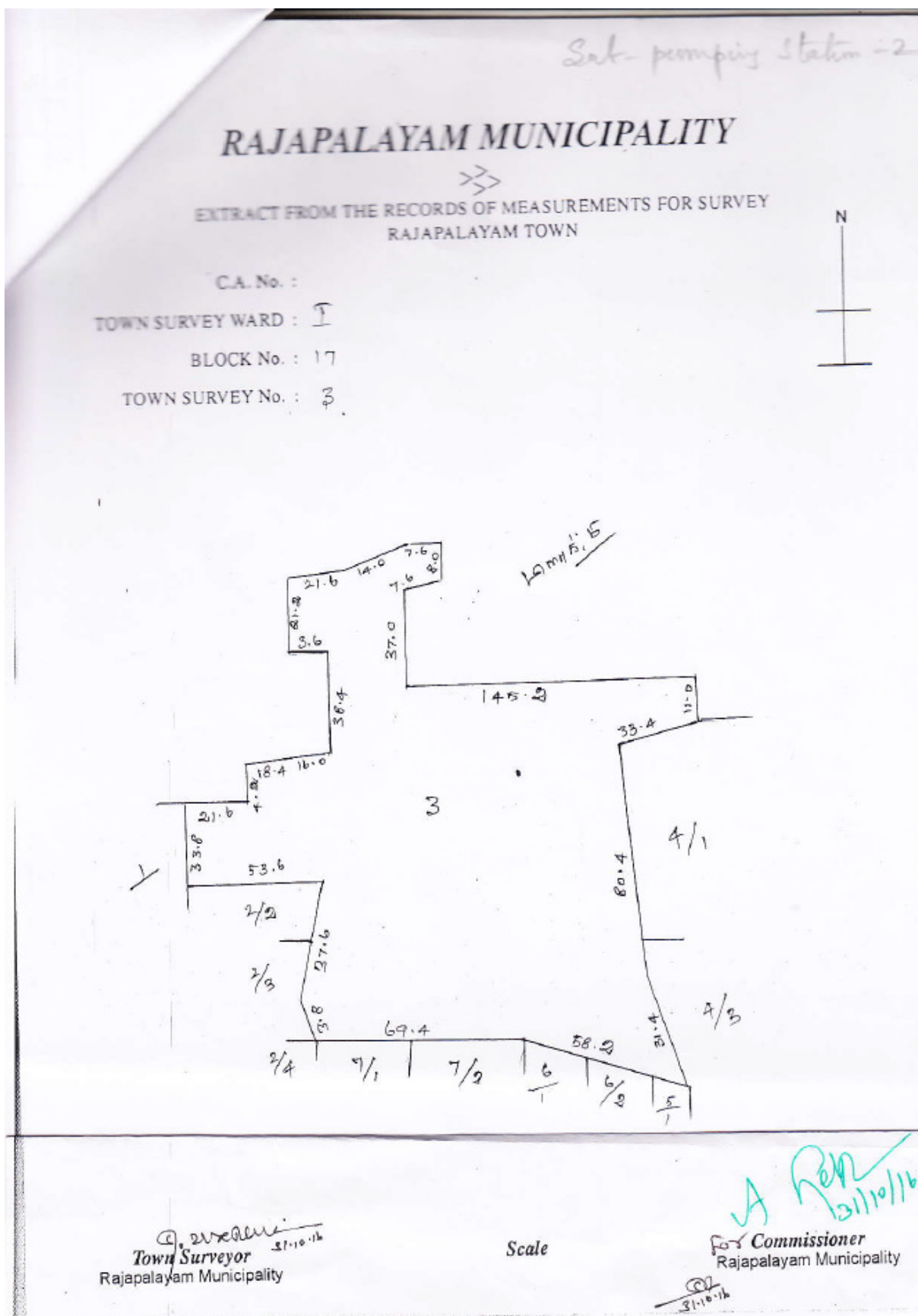
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ஸ்ரீலங்கை அல்லது தெருவின் பெயர்	தம்பர்		பழைய சர்வே நம்பரும் ஸ்டீட்கும்	முனிசிபல் கட்டிட எண்.	சர்க்கார் மிட்டா ஜமீன்தாரி இனாம்	பஞ்சாயத்து தீர்மானம் புறம்போக்கு மனை	பாப்ச்சனாதாரமும் வசூலும்	இரு போலமானால் காம்போசிக்ஷன் ரூபே	மண்ணின் தரமும் தீனாகம்	தரம்	ஹெக்டேர் ஒன்று ரூபே	டவுண் சர்வே விஸ்தீரணம் ச.மீ.	இனாம் பைடில் நம் ரிஜிஸ்தரில் ரவர் பெயரும்	அபங்கல்	நிலம் எவ்வளவு உபயோகப்படுகிறது	வாரா
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ச. 29.1.18
நகர சார் ஆய்வாளர்
இராஜபாளையம் நகராட்சி

ஆணையாளர்
இராஜபாளையம் நகராட்சி
29.1.18





டவுண் சர்வே ரிஜிஸ்ட்ரல்)

பொளையம் டவுண் சர்வே வார்டு: 9 பிளாக் எண்: 17 T.S. No. 3 CA. No.

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21-10-16
நகர சார் ஆய்வாளர்
இராஜபாளையம் நகராட்சி

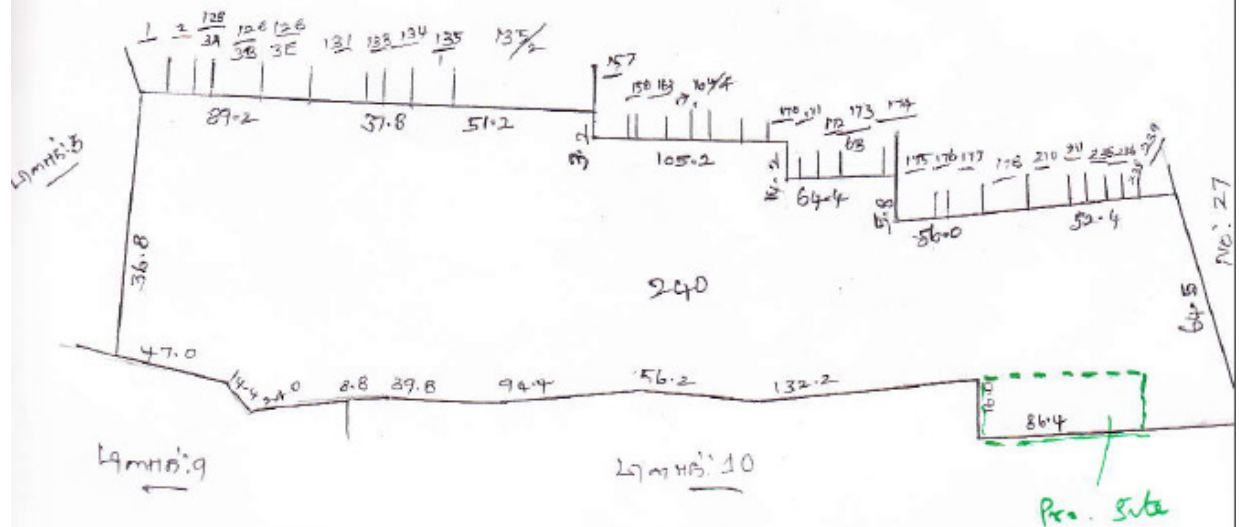
21/10/16
ஆணையாளர்
இராஜபாளையம் நகராட்சி

→ →

A diagram consisting of a vertical line with a horizontal line intersecting it at its midpoint. The letter 'N' is positioned at the top of the vertical line.

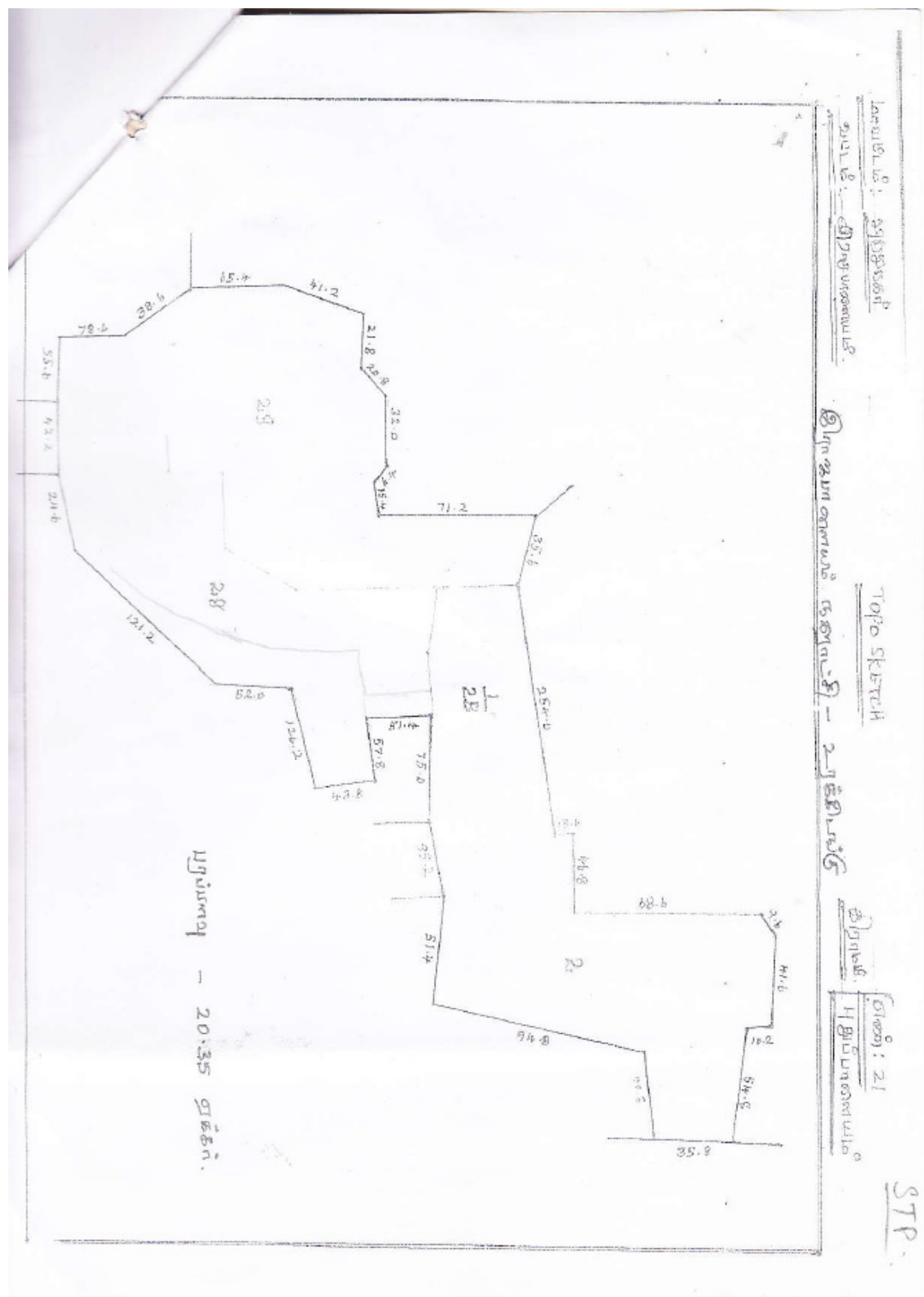
TOWN SURVEY WARD : J

TOWN SURVEY No. : 240



Next to *Scale*

For - **Commissioner**
Rajapalayam Municipality



MUNICIPAL ADMINISTRATION AND WATER SUPPLY DEPARTMENT

From

Thiru A.Rajamani,
Municipal Manager and
Commissioner,(D)
Rajapalayam Municipality

TO

Dr.A.Raman,
Deputy Mangar & ESSM,
Tamilnadu Urban Infrastructure
Financial services Ltd. (TNUIFSL)
19 T.P.Scheme road,
Raja Annamalaipuram
Chennai. 28

Roc.No.E1/1905/2015 dated 13.02.2018

Sir,


Sub: UGSS scheme- Rajapalayam Municipality – clarification
sought by the PPTA expert - details provided- Regarding.


Ref: Your email letter dated 07.02.2018

I enclosed herewith the details pertaining to the clarifications sought by the PPTA expert regarding the Rajapalayam Municipality UGSS as follows.

- 1) Land cost estimate for HR & CE land proposed for the North Avarampatti MPS site
Estimate copy is attached for your ready reference.
- 2) Final Alignment details for the PM from MPS to STP.
The pumping main from Andalpuram MPS to STP has been proposed to lay in the way of State Highway, ULB Road and Panchayat Road. There is no necessity to lay the pumping main on the other private lands.

Encl: Estimate


Commissioner,(D)
Rajapalayam Municipality


13.2.18

RAJAPALAYAM MUNICIPALITY
LAND COST ESTIMATE FOR HR&CE LAND PROPOSAL FOR NORTH AVERAMPATTI MPS SITE- AS PER GUILD LINE VALUE

S/no	DEATAILS OF LAND	LAND BELONGS TO	REQUIRED EXTENT OF LAND FOR MSP IN SQ.M	GUILD LINE VALUE	RATE PERPER SQ.M	AMOUNT
1	NORTH AVERAMPATTI STREET RAJAPALAYAM TOWN SURVEY WARD B,BLOCK 18, TS NO 103	HINDU RELIGIOUS AND CHARITABLE ENDOWMENTS DEPARTMENT GOVERNMENT OF TAMIL NADU	1689.90	3975.00	M2	Rs67,17,352.50 or say 67,17,353.00

Note: The alination proposal for the purchase of required land to establish proposed MSP Site at Averampatti has been submitted to the Commissioner HR& CE Dept vide this office letter Roc no 9284/2003/F1 Dated 11.10.2017 to a extent of 1689.90 m2 through proper channel. Now the same has also been forwarded by the Joint Commissioner Sivangai to the Commissioner HR&CF Dept vide Roc no 5116/2017/A3 Dated 07.02.2018 for the appropriate making of decision.


 Commissioner (D)
 Rajapalayam Municipality

13.2.18

End: Estimate

PROPOSED STRUCTURE OF SUBPROJECT INFORMATION DISCLOSURE LEAFLET

Up to 2-3 pages maximum.

Sub-project Information	Description
Name of the subproject, EA/IA and city	
Proposed subproject technical details and project benefits	
Summary of subproject impacts	
Compensation and entitlements	
Resettlement Plan (Resettlement Plan) budget	
Resettlement Plan implementation schedule	
Consultation and disclosure requirements	
Implementation structure and GRM information	
Contact numbers of CMSC, PIU, PMU	

Attach list of affected persons and Entitlement Matrix to this leaflet.

SAMPLE GRIEVANCE REGISTRATION FORM

(To be available in Tamil and English)

The _____ Project welcomes complaints, suggestions, queries, and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback. Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing *(CONFIDENTIAL)* above your name. Thank you.

Date	Place of registration	Project Town			
		Project:			
Contact information/personal details					
Name		Gender	* Male * Female	Age	
Home address					
Place					
Phone no.					
E-mail					
Complaint/suggestion/comment/question Please provide the details (who, what, where, and how) of your grievance below: If included as attachment/note/letter, please tick here:					
How do you want us to reach you for feedback or update on your comment/grievance? 					

FOR OFFICIAL USE ONLY

Registered by: (Name of official registering grievance)	
Mode of communication: Note/letter E-mail Verbal/telephonic	
Reviewed by: (Names/positions of officials reviewing grievance)	
Action taken:	
Whether action taken disclosed:	Yes No
Means of disclosure:	