

## **ENVIRONMENTAL AND SOCIAL REVIEW SUMMARY (ESRS) PROJECT Tuticorin International Container Terminal Private Limited (TICTPL)#47541**

### ***Disclaimer***

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### **Project Description**

Tuticorin International Container Terminal Private Limited (TICTPL or the “Company”) is a special purpose vehicle (SPV) and wholly owned subsidiary of J M Baxi Ports and Logistics Limited (“JMBPLL” or the “Sponsor”). TICTPL (formed in August 2022) entered into a 30-year Concession Agreement (CA) with the Board of V.O. Chidambaranar Port Authority (VOCPA) in September 2022 for conversion of the existing Berth 9, which has been operating as a bulk cargo (fertilizers, coal, etc) terminal since 2007, into a container terminal (the “Terminal”) on a Design, Build, Finance, Operate and Transfer (DBFOT) basis. The Terminal is located within the V O Chidambaranar Port (formerly known as Tuticorin port) which is one of the major ports of India, located in the state of Tamil Nadu.

The Terminal will have an overall length of 334.50 m and 29.10 m breadth, plus a backup area of 10 Ha, which represents 1% of the total Port area and the nearest settlement is located beyond 5 km distance. The project primarily involves strengthening/upgradation/extension of existing berth (by 30 m) and installing of container handling equipment to increase the cargo handling capacity. The investment will include: (i) development of the 10 ha back up area ; (ii) strengthening/upgradation/extension of existing berth by 35.5 m length and 60 m width; (iii) concretizing the yard area; and (iv) provision of fenders, bollards, mooring rings, firefighting system, water supply system, electrification etc. at suitable locations and installing of container handling equipment including 9 no. Electric Rubber Tyred Gantry Crane (e-RTGCs), 3 no. Rail Mounted Quay Crane (RMQC), 18 no. Internal Transport Vehicle (ITV) and 1 no. Reach Stacker (the “Project”). The entire construction phase is schedule to be completed by July 2024.

The proposed IFC investment is A loan of up to US\$56 million for the conversion of the Berth 9 to a container terminal, adding another 0.6 million TEU (twenty-foot equivalent unit) capacity to VOCPA’s existing 1.17 million TEU of container handling capacity.

### **Overview of IFC’s Scope of Review:**

IFC’s environmental and social (E&S) due diligence comprised of: 1) review of E&S related documents shared by the company; 2) discussion with company's senior management and corporate staff from: health, safety and environment (HSE) and human resources (HR); and 3) discussions with relevant stakeholders of VOCPA. Further, the review included site visit to the project in November 2022 together with third-party E&S consultant who carried out E&S Due Diligence (ESDD) of the project against the requirements of the applicable national legal and regulatory requirements and IFC Performance Standards 2012 (IFC PS), and with reference to good international industry practice (GIIP) per World Bank Group (WBG) General Environmental Health and Safety Guidelines (2007) and WBG Environmental Health and Safety Guidelines for Ports, Harbors and Terminals (2017).

This appraisal further builds upon the information and documentation available to IFC in the context of the previous investments with the Sponsor (VCTII #41434 - committed in August 2019 and KICT #45328 – committed in March 2022).

**Identified Applicable Performance Standards:**

*While all Performance Standards (PSs) are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following PSs.*

PS1: Assessment and Management of Environmental and Social Risks and Impacts

PS2: Labor and Working Conditions

PS 3: Resource Efficiency and Pollution Prevention

PS 4: Community Health, Safety and Security

PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

The proposed brownfield expansion will be within the premises of an existing operational port with no land acquisition involved and key risks and impacts will therefore be limited within immediate port area and the project is not expected to result in any new significant long-term impacts. There is no capital dredging envisaged and within the scope of TICTPL. Maintenance dredging is not anticipated in the foreseeable future and any berth pocket dredging (if any required) to address future requirement will be restricted only to the deepening of the berth pockets and quantity would not be significant. It will continue to be responsibility of VOCPA to dispose of dredged materials at designated locations if at all any dredging occurs in the future. Hence impact due to involuntary resettlement (PS5), impacts on Indigenous Peoples (PS7) or cultural heritage (PS8) are not expected.

*If IFC's investment proceeds, IFC will periodically review the project's ongoing compliance with the Performance Standards.*

**Environmental and Social Categorization and Rationale:**

The project primarily involves strengthening/upgradation/extension of existing berth (by 30 m) and installing of container handling equipment to increase the cargo handling capacity; key risks and impacts will therefore be limited within existing premises of VOCPA and the project is not expected to result in any new significant adverse E&S risks and/or impacts. Accordingly, this is a Category B project as per IFC's Policy on Environmental and Social Sustainability and key risks and impacts are limited, largely reversible and can be avoided or mitigated by adhering to generally recognized performance standards, guidelines or design criteria.

Key E&S issues related to the project and reviewed at appraisal are: (i) company's management & monitoring systems to assess and manage E&S risks and impacts from its operations; (ii) assurance of fair, safe and healthy working conditions for employees and contracted workers, including GBVH, in line with the legal and PSs requirements and consistent management of OHS policies and practices; (iii) monitoring and management of air emissions, waste and wastewater and hazardous materials; emergency response preparedness and response; and (iv) community engagement activities related to E&S commensurate to the risks and impacts associated with the company's operations.

**Environmental and Social Mitigation Measures**

*IFC's appraisal considered the environmental and social management planning process and documentation for the project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in*

*the paragraphs that follow and (if applicable) in an agreed Environmental and Social Action Plan (ESAP). Through the implementation of these measures, the project is expected to be designed and operated in accordance with Performance Standards objectives.*

***PS 1 - Assessment and Management of Environmental and Social Risks and Impacts***

TICTPL is a newly formed SPV and yet to commence operations at the site. At the Group level, a quality, environmental, occupational health and safety (QEHS) manual and occupational health and safety management system (OH&SMS) manuals have been developed which include detailed procedures for ensuring compliance with applicable legal, regulatory and other requirements; Hazard Identification and Assessment of Risk and Opportunity (HIARO); performance measurement and monitoring; communication (internal and external); incident investigation and root cause analysis; safety, including safety guidelines for contractors; emergency response procedures; and internal audit mechanisms and management review. Going forward, as included in the ESAP#1, (i) TICTPL will adopt the QEHS policy and the security management policy of the Group; (ii) develop and implement a site-specific Environmental Health and Safety (EHS) management system/Integrated Management System (IMS) compliant with IFC Performance Standards and develop QEHS/OH&SMS manuals which will include an assessment of environmental, occupational health and safety risks and impacts from its operations, and operational control procedures to mitigate the identified risks and impacts. The manuals will include Standard Operating Procedures (SOPs)/work instructions aligned with applicable sections of the IFC EHS Guidelines incorporating the following elements, at a minimum: (a) identification procedure of risks, impact assessment and EHS&S management procedures for entire project cycle; (b) framework for developing site specific E&S management programs; (c) organizational structure for EHS management system implementation; (d) training and capacity building; (e) monitoring and review mechanism; (f) stakeholder engagement; and (g) grievance mechanism; and (iii) implement a security management system (SMS) and develop a security management plan as per International Ship and Port Facility Security (ISPS) protocol including security management policy, access point security deployment, CCTV monitoring, parameter patrolling and cargo security.

An Environment Impact Assessment (EIA) was carried out by third-party agency in January 2018 for deepening the harbor basin and approach channel to handle 15.20 m draught vessels for the entire port and including the scope for strengthening and upgradation of existing Berth 9 and based on which Environmental Clearance (EC) was obtained in February 2019. It is understood that VOCPA has in place valid consent and authorization from Tamil Nadu Pollution Control Board (TNPCB) for its current operations and will update the regulatory consent from TNPCB for capacity expansion, prior to commencement of project. A third-party ESDD of the project was carried out in November 2022 against the requirements of the applicable national regulatory requirements and IFC PS and which includes an action plan that TICTPL will implement as per timelines mentioned.

For the proposed construction works such as extending the berth by 35.5 m x 60 m; paving the yard area for Phase II; installation of fenders, bollards, mooring rings, firefighting system, water supply system, electrification and installing of container handling equipment, TICTPL will, contractually require the EPC contractor to develop and implement a construction phase EHS management plan and Environmental, Health and Safety (EHS) monitoring plan aligned with IFC Performance Standards and the corporate QEHS manual (ESAP#2).

There is a dedicated EHSS team at the corporate level and as a practice, JM Baxi Group have dedicated EHS team at each SPV level. As the project is still at a planning stage, hence, no dedicated EHS personnel have been deployed at site. Going forward as included in ESAP#3, TICTPL will deploy an environment professional and a safety professional for the project during construction stage and will suitably enhance its EHS organization for the operation stage with clearly defined roles and responsibilities and reporting lines for staff managing EHS issues. TICTPL will have a structured EHS training program covering aspects such

as health and safety, first aid, fire safety and vehicle safety and training is provided to all staff including contractor workers. As included in ESAP#4, TICTPL will ensure that the EPC contractor deploys an EHSS organization comprised of at least one dedicated environment professional, safety professionals and human resource professionals. TICTPL will require the EPC contractor to implement an EHS training program for the construction workers including induction training, daily tool-box talk, training on emergency response and construction safety. TICTPL will require third party audit during the project construction phase, commencing within three months of start of construction.

VOCPA has in place disaster management plan including emergency contingency and business continuity plan, prepared by the marine department of VOC port trust. As included in ESAP#5, TICTPL will develop a site-specific emergency response management plan including details on key personnel and their responsibilities; details of site plan indicating emergency control center, assembly points and emergency exits and emergencies and response procedure (for various scenarios including fire, flood, cyclone, earthquake, epidemic and terrorist attack).

Environmental monitoring will be governed largely by the permit requirements and going forward as included in ESAP#6, TICTPL will develop a monitoring plan including aspects such as equipment emissions, ambient air quality, ambient noise, illumination, drinking water quality, treated grey wastewater quality, hazardous wastes generated and disposed, energy and water consumption and CO2 emissions, marine water physical and biological parameters and sediment characteristics. Occupational health and safety (OHS) lead and lag indicators including lost time incidents (LTI), first aid cases, property damages, near miss/dangerous occurrence, hazardous conditions will also be included.

### ***PS 2 – Labor and Working Conditions***

The construction works are yet to commence and TICTPL is in the process of finalizing design consultant and the Engineering and Procurement and Construction (EPC) contractor. The required workforce for construction and operation would be estimated after the technical consultant finalizes the project development plan but it is expected that a total workforce of about 270 personnel would be deployed during construction phase and about 360 (including direct employees and contract workers (provided through manpower agencies with whom TICTPL will sign a contract)) would be engaged during the operation phase. The contract workers would be mainly involved in terminal operation and maintenance, housekeeping and horticulture activities.

JM Baxi Group has corporate Human Resources (HR) policies and procedures that apply to the direct employees and includes information on: leave, attendance, code of conduct, working hours, holiday, maternity benefit, medical benefits, provident fund (PF) and other applicable allowances and gratuity. The Group has various policies in place such as sexual harassment policy and prevention of child and forced labor policy. Based on consultation with VOCPA representatives, it is understood that there are 5 registered worker unions. Given that operations are yet to commence so there is no existing workers' union.

Going forward as included in ESAP#7, TICTPL will develop project specific HR policies and practices to comply with statutory as well as PS2 requirements and specifically including the: (a) the provision for rights of employees to form and join unions; (b) update the retrenchment procedure; and (c) update the existing grievance redress policy, all meeting IFC PS 2 requirements.

TICTPL will contractually ensure that its EPC and Operation and Maintenance (O&M) contractors have HR policies and procedures that meet the requirements of relevant national laws and IFC PS2 including principles of non-discrimination, prevention of child and forced labor and ensuring adherence to applicable labor laws provisions on working hours, overtime provisions and availability of grievance mechanism (ESAP#8).

Corporate employee grievance policy is in place which outlines two-stage approach with timelines for resolving complaint/grievances raised by employee. As included in ESAP#7, TICTPL will include as part of HR manual, an updated grievance mechanism meeting IFC PS 2 requirements clarifying the various channels through which a complaint can be filed, laying down time bound steps for redress of the complaints and provisions for appeal to a higher authority in the event the complainant feels the concerns have not been resolved. The grievance mechanism will be accessible to all workers including contracted workers engaged in terminal operation and maintenance, will enable employees to raise anonymous complaints and will have provisions for protection of confidentiality and non-retribution. TICTPL will maintain grievance records and will monitor redress of grievances.

As included in ESAP#1, TICTPL will prepare an OH&SMS manual which will include an assessment of occupational health and safety risks and impacts from its operations and operational control procedures to mitigate the identified risks and impacts. It is understood that TICTPL will have in place a safety committee comprised of both worker and management staff, which would meet every month. Mock drills will be conducted, opportunities for improvement identified and corrective measures implemented.

TICTPL will also implement a permit-to-work system for routine and non-routine operations and organize regular training program, toolbox talk for both employees and contracted workers on H&S aspects. Usage of personal protective equipment (PPE), safety signage, vehicle speed and movement plan on the terminal will be implemented.

Aligned with corporate requirements, TICTPL will implement a safety training program to ensure that all employees and contracted workers are properly trained in the relevant hazards, fire and other safety procedures and emergency response. Accident, incident and near misses, including those involving contracted workers, will be recorded, investigated, and reported and corrective action implemented.

As included in ESAP#9, TICTPL will ensure compliance to safety requirement and conduct regular monthly meetings and safety performance check for all contractors. A checklist for evaluation of contractor's safety performance will be developed including aspects such as provision of PPE, availability of supervisors, awareness of emergency response plan (ERP) and emergency exits/evacuation procedures and training undertaken on HSE aspects. Further TICTPL will develop a contractor management plan with detailed procedures to monitor, audit and document contractor compliance with national requirements and IFC Performance Standards.

### ***PS3 - Resource Efficiency and Pollution Prevention***

Potential environmental impacts from construction activities are expected to be standard impacts and include point source emissions and fugitive dusts, soil erosion and sediment loading increases, noise, waste management, spills of hazardous and other material during transport and construction, water usage and emissions from construction equipment. TICTPL will contractually require their EPC contractor to (as part of the EHS management plan mentioned at ESAP#2), control these to acceptable levels through application of standard construction environmental controls and mitigation measures consistent with IFC PSs and applicable WBG EHS guidelines. Some of the specific mitigation measures to be applied include: installation of sediment traps to reduce sediment in runoffs from the construction areas; collection, storage and disposal of liquid and solid wastes generated during construction through authorized treatment and disposal facilities; implement measures to minimize risk of spill and overflow during transportation; provision of water sprays and wheel washing to control dust on roads and stockpiles; and covered transport of construction materials in trucks.

It is understood that 10 ha backup area proposed for development of container yard has been developed on reclaimed land (through deposition of dredged material by VOCPA) and with last capital dredging undertaken in 2012. While a section is already completed with paved surface above the reclaimed

compacted materials; the area is yet to be completed, requiring additional cutting, and filling for grading followed by paving of the reclaimed surface. As included in ESAP#10, TICTPL will undertake a Phase II assessment of the potential contamination of dredge material to establish the baseline before the site is handed over by VOCPA.

Pollution prevention and abatement aspects of relevance for TICTPL operations include: management of emissions to air from terminal equipment and transport vehicles; management of discharges on land or surface water including storm water, sewage, spills and other terminal waste; and management of marine invasive species; emergency response planning and preparedness. There is no capital or maintenance dredging envisaged at this stage. Any berth pocket dredging (if any required) to address future requirement will be restricted only to the deepening of the berth pockets and quantity would not be significant. It will continue to be responsibility of VOCPA to dispose of dredged materials at designated locations if at all any dredging occurs in the future.

TICTPL plans to deploy eco-RTG's which are more fuel efficient as compared to conventional RTGs. The company will monitor fuel consumption and implement programs to reduce specific fuel consumption. The company will, as part of the project, implement measures to improve energy and water efficiency during operation. Primary source of electricity will be grid but two diesel generators (DG) would be provided as backup power (1500 KVA and 600 KVA capacities respectively). It is understood that a dedicated fuel storage area with valid license from Petroleum and Explosives Safety Organization will be provided at a later date. TICTPL will require vessels to ensure that all safety and spill prevention measures are in place during bunkering of the vessel.

While significant impact on ambient conditions is not expected on account of the project, the company will continue to implement procedures to ensure that: (a) all equipment operated by the terminal are properly maintained and their emissions are within national standards and IFC EHS Guideline values; (b) trucks entering the terminal premises have appropriate pollution under control certificates; and (c) truck dwell time (particularly engine idling time) is minimized. The company will put in place procedures to ensure that refrigeration gases used in the reefers meet national ozone depleting substances rules requirements under the Montreal Protocol.

The total water requirement for the day-to-day operation of the terminal is estimated to be around 30 kilo liters which will be supplied by VOCPA. The primary liquid effluent generated on the terminal will be domestic wastewater/sewage, which will be treated on site in Sewage Treatment Plant (STP). Treated water from the STP will be utilized for gardening purposes and the sludge generated will be kept in a designated open space and handed over to the municipal authority for disposal.

Domestic waste/garbage generated on the terminal will be collected by authorized municipal contractors and disposed of at municipal bins or approved government-operated waste facilities. Stormwater from the berth area will be collected in a chamber after passing it through oil & grease traps and then discharged through a xx mm diameter pipe into the sea. The stormwater run-off from the scrap yard which could have oil & grease and other hazardous waste will be collected in an oil & grease separation pit associated with the stormwater network before the final release.

Ship/vessel generated waste, including bilge water, will be collected by authorized entities from the vessels and removed to an offsite location for treatment and disposal. As included in ESAP#11, TICTPL will develop and implement a waste management plan (including for hazardous wastes) and ensure provision for appropriate storage and handling practices (e.g. contained storage on paved surface with provision for leachate collection drain and sump) and ensure segregated storage for hazardous and non-hazardous waste and hazardous waste quantity to be recorded.

Greenhouse gas emissions are estimated to be 4741 tCO<sub>2</sub>e per annum.

#### ***PS4 - Community Health, Safety and Security***

Terminal operations of TICTL will have no interaction with the local communities. The terminal is located on a 4-lane road that connects to the national highway.

As included in ESAP#5, TICTPL will prepare an ERP and link the ERP to the VOCPA and district/local emergency authorities; undertake drills on emergency response; participate in drill conducted by VOCPA and/or district/local government emergency authorities; and continually improve the ERP based on outcome of the drills.

As included in ESAP#12, TICTPL will make provisions for fire protection system including fire extinguishers, fire alarm system and fire hydrants at key locations such as fuel dispenser, container stackyard, dock area, and administrative building. Fire safety certificate will have to be obtained from the Inspectorate of Fire Service as per the regulatory requirements. Regular internal inspections for all fire equipment will need to be conducted.

TICTPL will deploy security personnel (expected to be around 50) through an outsourcing agency. It is understood that no armed guards will be deployed and as included in ESAP#1, TICTPL will implement a formal security management system and develop a security management plan as per International Ship and Port Facility Security (ISPS) protocol including security management policy, access point security deployment, CCTV monitoring, parameter patrolling and cargo security. Detailed standard operating procedures will be developed that security personnel will be required to adhere to and such that security incidents are recorded, investigated and corrective action implemented. Security awareness training will be provided to all employees and contracted workers. Past records of security personnel will be screened and process in place to take disciplinary action against security personnel who violate standard operating procedures aligned with corporate procedures implemented at the Group level.

#### ***PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources***

The port is located on the southern edge of Thoothukudi Bay which lies on the Gulf of Mannar between the southeastern edge of India and Sri Lanka. The port itself lies within the buffer area of the Gulf of Mannar Man and Biosphere Reserve (GoMBR). Approximately 10 km to the north and extending for a further 100 km to the northeast is the Gulf of Mannar Marine National Park which constitute the core of the GoMBR. The Reserve contains seagrasses, coral reefs and mangrove forests which play host to a population of Dugong *Dugon dugon* which is listed as IUCN Vulnerable as well as turtles, corals, nearshore fishes and marine mammals. A management plan has been prepared for the GoMBR by the Wildlife Institute of India and it is the responsibility of government and NGO stakeholders to coordinate implementation.

The port expansion itself will occur within the footprint of existing facilities. These areas have been extensively modified during the port's operation over at least 20 years and it is not expected that the container terminal expansion will increase impacts to biodiversity. Given that the port is located within the GoMBR, consultation with the administrative authority of the Reserve and operations of the container terminal will be required as part of the SEP to be developed under ESAP#1 and requirements to manage biodiversity risks will be incorporated into the EHS management system. These actions will be required to be consistent with management plans developed for GoMBR.

#### **Stakeholder Engagement:**

As included in ESAP#1, TICTPL will develop and implement a stakeholder engagement plan (SEP) in compliance with IFC Performance Standards and as part of the SEP, also put in place a formal procedure

to receive concerns and grievances from members of affected communities if any. As part of the environmental clearance approval, public hearing was conducted in December 2017.

Further, the company plans to undertake corporate social responsibility programs once the project is operational.

**Broad Community Support:**

BCS – Not Applicable

**Local Access of Project Documentation:**

The company will make publicly available this ESRS and ESAP through its website and will keep a copy available at the terminal main gate.

Any queries and/or comments about the project may be directed to:

Company: Tuticorin International Container Terminal Private Limited  
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**Environmental and Social Action Plan**

S. N.	Description	Indicators of Completion/Deliverables	Expected Timeline	Indicative dates
1	TICTPL will: (i) adopt the quality, environmental, occupational health and safety (QEHS) policy and the security management policy of the Group; (ii) develop and implement a site-specific Environmental Health and Safety (EHS) management system/Integrated Management System (IMS) compliant with IFC Performance Standards and develop QEHS/OH&SMS manuals which will include an assessment of environmental, occupational health and safety risks and impacts from its operations, and operational control procedures to mitigate the identified risks and impacts. The manuals will include Standard Operating Procedures (SOPs)/work instructions aligned with applicable sections of the IFC EHS guidelines incorporating the following elements, at a minimum: (a) identification procedure of risks, impact assessment and	Copy of TICTPL's QEHS and security management policy  Copy of TICTPL's Environmental Health and Safety (EHS) management system/and QEHS/OH&SMS manuals	2 months before start of construction	1 March 2023



S. N.	Description	Indicators of Completion/Deliverables	Expected Timeline	Indicative dates
	EHS&S management procedures for entire project cycle; (b) framework for developing site specific E&S management programs; (c) organizational structure for EHS management system implementation; (d) training and capacity building; (e) monitoring and review mechanism; (f) stakeholder engagement (including consultation with the administrative authority of the Reserve); (g) grievance mechanism; and (iii) implement a security management system (SMS).			
2	TICTPL will, contractually require the EPC contractor to develop and implement a construction phase EHS management plan and a EHSS monitoring plan aligned with IFC Performance Standards and the corporate QEHS manual.	Construction phase EHS management plan	2 months prior to start of construction activities	1 March 2023
3	TICTPL will deploy an environment professional and a safety professional for the project during construction stage and will suitably enhance its EHS organization for the operation stage with clearly defined roles and responsibilities and reporting lines for staff managing EHS issues.	EHS organization chart	2 months prior to start of construction activities	1 March 2023
4	<p>TICTPL will ensure that the EPC contractor deploys an EHSS organization comprised of at least one dedicated environment professional, safety professionals and human resource professionals. TICTPL will require the EPC contractor to implement an EHS training program for the construction workers including induction training, daily tool-box talk, training on emergency response and construction safety.</p> <p>TICTPL will require third party audit during the project construction phase, commencing within three months of start of construction.</p>	EHS organization chart	2 months prior to start of construction activities	1 March 2023
5	TICTPL will develop a site-specific emergency response management plan including details on key personnel and their responsibilities; details of site plan indicating emergency control center, assembly points and emergency exits and emergencies and response procedure (for various scenarios including fire, flood, cyclone, earthquake, epidemic and terrorist attack).	Copy of emergency response management plan	2 months prior to start of operations	31 Oct 2024
6	TICTPL will develop a monitoring plan including aspects such as equipment emissions, ambient air quality, ambient noise, illumination, drinking water quality,	EHSS monitoring plan	2 months after start of operations	28 Feb 2025

S. N.	Description	Indicators of Completion/Deliverables	Expected Timeline	Indicative dates
	treated grey waste water quality, hazardous wastes generated and disposed, energy and water consumption and CO2 emissions, marine water physical and biological parameters and sediment characteristics. Occupational health and safety (OHS) lead and lag indicators including lost time incidents (LTI), first aid cases, property damages, near miss/dangerous occurrence, hazardous conditions will also be included.			
7	TICTPL will develop project specific HR policies and practices to comply with statutory as well as PS2 requirements and specifically including the: (a) the provision for right of employees to form and join unions; (b) update the retrenchment procedure; and (c) update the existing grievance redress policy, all meeting IFC PS 2 requirements.	Updated HR policy	2 months prior to start of operations	31 Oct 2024
8	TICTPL will contractually ensure that its EPC and Operation and Maintenance (O&M) contractors have HR policies and procedures that meet the requirements of relevant national laws and IFC PS2 including principles of non-discrimination, prevention of child and forced labour and ensuring adherence to applicable labor laws provisions on working hours, overtime provisions and availability of grievance mechanism.	HR policy of EPC contractor	2 months prior to start of construction	1 March 2023
9	TICTPL will ensure compliance to safety requirement and conduct regular monthly meetings and safety performance check for all contractors. A checklist for evaluation of contractor's safety performance will be developed including aspects such as provision of PPE, availability of supervisors, awareness of emergency response plan (ERP) and emergency exits/evacuation procedures and training undertaken on HSE aspects. Further TICTPL will develop a contractor management plan with detailed procedures to monitor, audit and document contractor compliance with national requirements and IFC Performance Standards.	Contractor management plan and checklist for evaluation of contractor's safety performance	2 months prior to start of construction	1 March 2023
10	TICTPL will undertake a Phase II assessment of the potential contamination of dredge material to establish the baseline before the site is handed over by VOCPA.	Phase II report	Within 6 months of commitment	30 July 2023
11	TICTPL will develop and implement a waste management plan (including for hazardous wastes) and ensure provision for appropriate storage and handling practices	Waste management plan (including for hazardous wastes)	2 months prior to start of operations	31 Oct 2024

S. N.	Description	Indicators of Completion/Deliverables	Expected Timeline	Indicative dates
	(eg contained storage on paved surface with provision for leachate collection drain and sump) and ensure segregated storage for hazardous and non-hazardous waste and hazardous waste quantity to be recorded.			
12	TICTPL will make provisions for fire protection system including fire extinguishers, fire alarm system and fire hydrants at key locations such as fuel dispenser, container stackyard, dock area, and administrative building. Fire safety certificate will have to be obtained from the Inspectorate of Fire Service as per the regulatory requirements. Regular internal inspections for all fire equipment will need to be conducted.	Evidence of implementation of fire protection system	2 months prior to start of operations	31 Oct 2024