

Annex 6:

Comparison of POWERGRID’s “Processes and Procedures For Community Engagement, Public Consultation and Disclosure” with the Requirements of IFC Performance Standard 1

| Key Element | Requirement per PS 1 | POWERGRID ESPP | Significant Differences |
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| Community Engagement | <p>Community engagement is an on-going process involving the client’s disclosure of information. When local communities may be affected by risks or adverse impacts from a project, the engagement process will include consultation with them. The purpose of community engagement is to build and maintain over time a constructive relationship with these communities. The nature and frequency of community engagement will reflect the project’s risks to and adverse impacts on the affected communities. Community engagement will be free of external manipulation, interference, or coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information</p> | <p>POWERGRID uses or more of the following techniques to engage PAPs and the general public at various stage of the project cycle:</p> <ul style="list-style-type: none"> • Public Meetings at various locations along proposed TLs • Informal small group meetings along proposed TL routes • Information brochures and pamphlets • Public information offices at Operating field offices • Local planning and site visits by POWERGRID staff • Response to public inquiries • Press releases inviting comments • Project coordination and grievance committees (see below) • PAP appointed or elected ombudsman or representative • Public Displays | None |
| Disclosure | <p>Disclosure of relevant project information helps affected communities understand the risks, impacts and opportunities of the project. Where the client has undertaken a process of Social and Environmental Assessment, the client will publicly disclose the Assessment document. If communities may be affected by risks or adverse impacts from the project, the client will provide such communities with access to information on the purpose, nature and scale of the project, the duration of proposed project activities, and any risks to and potential impacts on such communities. For projects with adverse social or environmental impacts, disclosure should occur early in the Social and Environmental Assessment process and in any event before the project construction commences, and on an ongoing basis (see paragraph 26 below).</p> | <p>See above section on Community Engagement</p> <p>POWERGRID posts environmental impact assessments on its website during the project development process</p> | None |
| Consultation | <p>If affected communities may be subject to risks or adverse impacts from a project, the client will undertake a process of consultation in a manner that provides the affected communities with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the client to consider and respond to them. Effective consultation: (i) should be based on the prior disclosure of relevant and adequate information, including draft documents and plans; (ii) should begin early in the Social and Environmental Assessment process; (iii) will focus on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these; and (iv) will be carried out on an ongoing basis as risks and impacts arise. The consultation process will be undertaken in a manner that is inclusive and culturally</p> | <p>Public consultation is an integral part of the process throughout the planning and execution of a project (ESPP p. 17). The ESPP itself is a product of an extensive National Consultation Process including four regional workshops and a national workshop involving about 450 individual participants including PAPs, community representatives, social organizations government agencies, concerned citizens and international financials institutions. Notices were published in English and regional vernacular languages</p> | None. |

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| | appropriate. The client will tailor its consultation process to the language preferences of the affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. ¹ | | |
| Grievance Mechanism | The client will respond to communities' concerns related to the project. If the client anticipates ongoing risks to or adverse impacts on affected communities, the client will establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project. It should address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, and at no cost and without retribution. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of its community engagement process. | As part of POWERGRID's Social Entitlement Framework (SEF) a Grievance Redressal Committee (GRC) is established comprising POWERGRID, representatives of local authorities, PAPs, Gram Panchayat or other well-reputed persons as agreed with the local authorities and PAPs to address any grievances of the PAPs. PAPs are informed about the existence of the GRC during the consultation process and are advised to approach the Chair or the site office of POWERGRID regarding any grievance regarding land acquisition or R &R. The GRC shall be convened within 15 days of notification of any grievance. | None. |
| Monitoring | As an element of its Management System, the client will establish procedures to monitor and measure the effectiveness of the management program. In addition to recording information to track performance and establishing relevant operational controls, the client should use dynamic mechanisms, such as inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes. For projects with significant impacts that are diverse, irreversible, or unprecedented, the client will retain qualified and experienced external experts to verify its monitoring information. The extent of monitoring should be commensurate with the project's risks and impacts and with the project's compliance requirements. Monitoring should be adjusted according to performance experience and feedback. The client will document monitoring results, and identify and reflect the necessary corrective and preventive actions in the amended management program. The client will implement these corrective and preventive actions, and follow up on these actions to ensure their effectiveness. | POWERGRID has established a Corporate Monitoring Group (CMG) dedicated to monitoring entire project activities and reporting to the Director of Projects. Regular monitoring of activities is carried out at RHQ and sites and reports are reviewed by the regional head on a monthly basis. CMG reviews activities in each region at a quarterly project review meeting. An Environmental and Social Monitoring Plan (ESMPO) is developed for each project based on baseline data and impacts predicted during the environmental and social impact assessment process. Concerned Forest Department staff monitor impacts on ecological resources surrounding TLs. Implementation of POWERGRID's Social Entitlement Framework, including R &R the RAP is monitored by a committee chaired by the concerned head of the region and including representatives of local authorities, Panchayat, PAPs and NGOs. Corrective measures, if required, will be incorporated into the RAP. Third party evaluation and assessment of the RAP may be undertaken by external agencies to assess RAP results and other R & R measures. The ESMP is integrated with the construction, operation and maintenance and is monitored by ESMD on a monthly basis in association with the CMG. | None. |
| Reporting -Internal | Senior management in the client organization will receive | Senior management is apprised of the results on the EPMP and RAP | None. |

¹ For projects with significant adverse impacts on affected communities, the consultation process will ensure their free, prior and informed consultation and facilitate their informed participation. Informed participation involves organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities.

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| | periodic assessments of the effectiveness of the management program, based on systematic data collection and analysis. The scope and frequency of such reporting will depend upon the nature and scope of the activities identified and undertaken in accordance with the client's management program and other applicable project requirements. | monitoring for each project through a monthly report. | |
| <i>External Reporting</i> | The client will disclose the Action Plan to the affected communities. In addition, the client will provide periodic reports that describe progress with implementation of the Action Plan on issues that involve ongoing risk to or impacts on affected communities, and on issues that the consultation process or grievance mechanism has identified as of concern to those communities. If the management program results in material changes in, or additions to, the mitigation measures or actions described in the Action Plan on issues of concern to the affected communities, the updated mitigation measures or actions will also be disclosed. These reports will be in a format accessible to the affected communities. The frequency of these reports will be proportionate to the concerns of affected communities but not less than annually. | POWERGRID has established a Committee of External Experts to provide ongoing advice on its implementation of the ESPP on the corporate level and in specific projects. | POWERGRID does not publicly disclose the content of periodic reports prepared by its Committee of External Experts on individual projects. |
| Documentation | The client should document specific actions, measures or other instances of decision-making that have been influenced by or resulted directly from the input of those who participated in the consultation. | POWERGRID requires that public consultations be documented with the date of each meeting, venue, number and possibly the names of attendees, the issues discussed and the outcomes of the meetings | POWERGRID does not systematically document specific actions taken in response to public consultations. |