

The State of Tamil Nadu Strengthening Coastal Resilience and the Economy (P180932)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

January 2025

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The State of Tamil Nadu (the “Project Implementing Entity” or “PIE”) will implement the Strengthening Coastal Resilience and the Economy Program (the Project), with the involvement of the Tamil Nadu Green Climate Company (TNGCC), as set out in the Loan Agreement between India (the “Borrower”) and the International Bank for Reconstruction and Development (the “World Bank”) and the Project Agreement between the World Bank and the State of Tamil Nadu. The World Bank has agreed to provide financing [(P180932)] for the Project, as set out in the referred agreement(s).
2. The PIE shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Loan Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the PIE, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the State of Tamil Nadu, through TNGCC, and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Chief Executive Officer, TNGCC. The PIE shall promptly disclose the updated ESCP.

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	REGULAR REPORTING [Environmental, social, health, and safety (ESHS) performance needs to be monitored and reported to the World Bank.] Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.	Submit quarterly to the World Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the World Bank no later than 45 days after the end of each reporting period.	TNGCC - SPMU
B	INCIDENTS AND ACCIDENTS Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.	Notify the World Bank no later than 48 hours after learning of the incident or accident. Provide subsequent report to the World Bank of the incident within the agreed timeframe between the Bank and the SPMU.	TNGCC - SPMU
C	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports on a consolidated basis to the World Bank every quarter	Submit quarterly to the World Bank throughout Project implementation, upon request as annexes to the reports to be submitted under action A above.	TNGCC - SPMU
D	THIRD PARTY AUDIT Undertake annual audits of its portfolio to review the status of ESMF compliance	Annually	TNGCC - SPMU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Establish and maintain an ESC Cell [Environment, Social and Communication] within Tamil Nadu Green Climate Company (TNGCC) with qualified staff and resources to support management of E&S risks and impacts of the Project including an Environment Specialist and a Social cum Communication Expert	Establish the ESC Cell "60 days after project effectiveness" and maintain throughout Project implementation.	TNGCC - SPMU
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS		TNGCC - SPMU

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	1. Adopt, disclose and implement the final Environmental and Social Management Framework (ESMF) for the Project, consistent with the applicable national laws/regulations and also relevant ESSs. Screen all the subprojects in accordance with the ESMF to screen out subprojects in the exclusion list, determine the level of assessment and type of subproject-level instrument to be prepared and implemented proportional to the level of risk. 2. Cause Tamil Nadu Project Executing Agencies (PEAs) –Department of Environment; the Department of Forests; the Department of Public Works; the Department of Urban Development; the Department of Water Resources; the Department of Agriculture and Farmers Welfare; the Department of Fisheries, and the Department of Tourism which are designated as Project Executing Agencies to screen all the subprojects in accordance with the ESMF to screen out subprojects in the exclusion list, determine the level of assessment and type of subproject-level instrument to be prepared and implemented proportional to the level of risk. Prepare and implement the site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF.	1. Adopt the final ESMF before board approval and thereafter implement the ESMF throughout Project implementation. 2. Before launching the bidding process for the respective subproject that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout subproject implementation.	
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	TNGCC - SPMU
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project specify the environmental and social instruments to be supported under the TA are carried out in accordance with terms of reference acceptable to the World Bank that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	TNGCC - SPMU
1.5	Prepare, adopt and implement a Risk Assessment and Risk mitigation plan for the usage of Drones in the project as per existing GoI guidelines and procedures and World Bank guidance note	Within 60 days of effectiveness and implement throughout project implementation	TNGCC- SPMU
1.6	CONTINGENT EMERGENCY RESPONSE FINANCING a) Ensure that the CERC Manual as specified the legal agreement] includes a description of the ESHS assessment and management arrangements including, if applicable, CERC-ESMF that will be included or referred to in the CERC Manual	a) The adoption of the CERC manual and, if applicable, other instruments, as relevant] in form and substance acceptable to the World Bank is a withdrawal condition under Section I,	TNGCC - SPMU

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	for the implementation of CERC component, e.g., CERC Part], in accordance with the ESSs. b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	B of , Schedule 2 of the Loan Agreement for the Project. b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt, disclose and implement the final Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Finalize, disclose and adopt LMP by board approval and thereafter implement the LMP throughout Project implementation.	TNGCC - SPMU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to hiring Project workers and thereafter maintain and operate it throughout Project implementation.	TNGCC - SPMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to be prepared as an annex in the ESMF to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as for the adoption and implementation of the ESMP	TNGCC - SPMU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP	TNGCC - SPMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP	TNGCC - SPMU

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs.	TNGCC - SPMU
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan [as part of the ESMP], to assess and manage the risks of SEA and SH.	Same timeframe as for the adoption and implementation of the ESMPs.	TNGCC - SPMU
4.4	SECURITY MANAGEMENT Assess, adopt and implement community health and safety measures included in the ESMPs (action1.2 above). The ESMPs will also include assessment of any ESS4 risks to the Project affected persons and their assets, and the Project.	Before launching the bidding process for the respective subproject that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout subproject implementation.	TNGCC -SPMU and all PEAs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt, disclose and implement the final Resettlement Policy Framework (RPF) (as part of ESMF) for the Project, consistent with ESS5.	Finalize, disclose and adopt the final RPF by board approval and thereafter implement the RPF throughout Project implementation.	TNGCC - SPMU
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP as set out in the RPF and consistent with ESS5.	Prepare, disclose and implement the respective RAP before commencement of civil works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and if applicable displaced people have been resettled and moving allowances have been provided.	TNGCC - SPMU
5.3	LIVELIHOOD RESTORATION PLANS: Provide livelihood restoration measures to economically displaced persons as per RPF	Throughout project implementation	TNGCC - SPMU
5.3	GRIEVANCE MECHANISM Adopt and implement a grievance mechanism (GM) to address resettlement related complaints as described in RPF and SEP.	Establish and operationalize grievance mechanism before commencement of project activities and thereafter maintain and operate it throughout Project implementation.	TNGCC - SPMU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	BIODIVERSITY RISKS AND IMPACTS Screen subprojects for potential risks and impacts on biodiversity and different types of habitats per ESS6 and screen out those with significant adverse impacts on critical habitat species/features. Prepare, adopt and implement subproject specific Biodiversity Management Plan (BMP) (if required) according to the ESMF, and consistent with ESS6.	Before proposals are submitted or prior to the preparation of the DPRs. Prepare and adopt the BMP prior to, bidding process, and thereafter implement the BMP throughout subproject implementation.	TNGCC - SPMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK Adopt, disclose and implement the Tribal Development Framework (as part of ESMF) for the Project, consistent with ESS7.	Finalize, disclose and adopt the Tribal Development Framework (TDF) before board approval and thereafter implement the TDF throughout Project implementation.	TNGCC - SPMU
7.2	INDIGENOUS PEOPLES PLAN Adopt and implement a Tribal Development Plan for each activity under the Project for which the TDF requires such TDP, as set out in the TDF, and consistent with ESS7.	Prepare and adopt the Tribal Development Plan (TDP) prior to, bidding process, for any activity that requires the preparation of such TDP. and thereafter, implement the respective TDP throughout Project implementation.	TNGCC - SPMU
7.3	GRIEVANCE MECHANISM Adopt and implement a grievance mechanism (GM) to address IP related complaints as described in the TDF and SEP.	Establish and operationalize grievance mechanism and thereafter maintain and operate it throughout Project implementation.	TNGCC - SPMU
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Screen subprojects for potential risks and impacts on cultural heritage per ESS8 and screen out those with significant adverse impacts on critical cultural heritage locations. Adopt and implement a Cultural Heritage Management Plan (CHMP) (if required) as part of the ESMF, ESMP, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Before launching the bidding process for the respective subproject. Adopt the CHMP prior to civil works commencement and thereafter implement the CHMP throughout Project implementation.	TNGCC - SPMU
8.2	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMF/ESMP of the Project.	Describe the chance find procedures in the ESMF. Implement the procedures throughout Project implementation.	TNGCC - SPMU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

**Environmental and Social Commitment Plan for Tamil Nadu Strengthening Coastal Resilience
And The Economy Project**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt, disclose and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Finalize, disclose and adopt the SEP before appraisal and thereafter implement the SEP throughout Project implementation.	TNGCC - SPMU
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish and operationalize the grievance mechanism before commencement of project activities and thereafter maintain and operate the mechanism throughout Project implementation.	TNGCC - SPMU
CAPACITY SUPPORT			
CS1	Prepare an E&S training plan to provide training to target groups for PIU staff, stakeholders, communities, Project workers on: • stakeholder mapping and engagement • specific aspects of environmental and social assessment and developing mitigation plans • community health and safety. • Gender based violence • Voluntary carbon markets • Sustainable nature-based tourism • Training and sensitization for Forest Services Officers and SPMU on SMP, code of conduct, and security protocols.	Throughout project implementation period	TNGCC - SPMU