

**INDIA**

**Gurugram Metro Rail Limited**

**Gurugram Metro Rail Project**

Metro Connectivity from Millennium City Centre to Cyber City

**Phase 1 of Sustainable Multimodal and Resilient  
Transport for Haryana (P510062)**

**Updated**

**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**Appraisal Version**

**05 March 2026**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Gurugram Metro Rail Limited (GMRL), a Special Purpose Vehicle established by the Government of India and the State Government of Haryana, will implement the Gurugram Metro Rail Project (GMRP) as Phase 1 of Sustainable Multimodal and Resilient Transport for Haryana, as set out in the Loan Agreement between India (Borrower) and the International Bank for Reconstruction and Development (World Bank (WB) or the Bank) and the Project Agreement between the WB, the State of Haryana and GMRL (collectively, the Legal Agreements). The WB has agreed to provide financing for the Project, as set out in the Legal Agreements.
2. The GMRL 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 WB. The ESCP is a part of the Legal Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Legal Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the GMRL shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESS, and in form and substance acceptable to the WB. Said E&S documents may be revised from time to time with prior written agreement by the WB. As provided for under the referred Legal Agreements, the GMRL shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the WB and the GMRL, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the State of Haryana, the GMRL, and the WB agree to update the ESCP to reflect these changes through an exchange of letters signed between the WB, the State of Haryana, and the GMRL. The GMRL shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>		
<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. Establish and maintain an Environmental and Social Management Unit (ESMU) within the GMRL with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the GMRP. The ESMU shall include a Social-cum-Resettlement and Rehabilitation Expert, an Environmental Health &amp; Safety Expert, and a Public Relations Officer.</p> <p>b. Maintain a General Consultant (GC), with qualified Environment Expert, Social Expert and Chief Safety Officer/s to support the GMRL in the management of risks and impacts of the Project.</p> <p>c. GMRL will engage an independent external E&amp;S monitoring agency, which shall also conduct the audit of all aspects of first civil package, (Construction of Viaduct and 14 Elevated Stations from Millennium City Centre to Sector 9 (inclusive) from chainage (-)594 m to 12603 m, Spur to Dwarka Expressway (1.85 km) and ramp to Depot at Sector 33 excluding PEB and Architectural finishing works of Gurugram Metro Corridor between Millennium City Centre and Cyber City (26.65 Km) and Spur from Basai Village to Dwarka Expressway (1.85 Km) with total 27 Stations), referred as CC01.</p>	<p>a. Establish an ESMU within the GMRL and hire or appoint experts no later than the Project Effective Date and thereafter maintain these positions throughout Project implementation.</p> <p>b. Engage a GC with qualified E&amp;S and H&amp;S experts and maintain these positions throughout Project implementation.</p> <p>c. Independent External Monitoring Agency will be appointed by GMRL through tendering process.</p>	<p>GMRL</p>

<p>B</p>	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Based on capacity assessment undertaken as part of ESIA, prepare and implement the following Capacity Building (CB) Plan for GMRL staff and GC’s E&amp;S, and Engineering/ Project Management staff and Contractors’ Supervisor and E&amp;S staff, and any others involved in the Project:</p> <ol style="list-style-type: none"> <li>1. Orientation training on Environment and Social Framework (ESF)</li> <li>2. Training on Environmental and Social Management Plan (ESMP) implementation, supervision, and reporting</li> <li>3. Training on Resettlement Action Plan (RAP) provisions and implementation approach</li> <li>4. Occupational Health &amp; Safety (OHS) and Community Health &amp; Safety with special focus on High Energy Hazards and Critical Controls, Incident Reporting, Root Cause Analysis and Corrective Action Plan preparation and implementation</li> <li>5. Management of impacts on Biodiversity and Habitats</li> <li>6. Pollution Management (Air, Water, Land, Noise/Vibration, Wastewater, Wastes) during all stages Pre-Construction, Construction, O&amp;M, Resource Efficiency &amp; Circular Economy</li> <li>7. Gender Based Violence (GBV) and Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risk mitigation measures, including composition and roles and responsibilities of Internal Complaints Committee (ICC)</li> <li>8. Grievance Mechanism (GM) - registration and redressal processes</li> <li>9. Monitoring and Evaluation requirements</li> <li>10. Emergency Response &amp; Life and Fire Safety</li> <li>11. Chance Find Procedures and Cultural Heritage</li> <li>12. Monitoring and Reporting on E&amp;S and EHS</li> </ol> <p>Prepare and implement the following capacity building measures for the Contractors’ H&amp;S Experts and Workers, Operations and Maintenance Staff:</p> <ul style="list-style-type: none"> <li>▪ Responding to emergencies such as earthquake, fire, flood, and others</li> <li>▪ OHS and CHS, including High Energy Hazards &amp; critical controls, and Incident Management</li> <li>▪ Works near Biodiversity and Cultural Heritage</li> </ul>	<p>Prepare the Training Calendar no later than one (1) month of the Project Effective Date, update and implement CB Plan throughout Project implementation.</p>	<p>GMRL through GC and RISA</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>▪ Pollution Management (Air, Water, Land, Noise/Vibration, Wastes and Waste water) during all stages Pre-Construction, Construction, and O&amp;M</li> <li>▪ GBV and SEA-SH risk mitigation measures</li> <li>▪ GM for redressing grievances/complaints of workers</li> </ul>		
MONITORING AND REPORTING			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety performance of the Project. These reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents as required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan (SEP).</li> <li>• Details of grievances received through GM, including entries in the grievance log and progress made towards their resolution.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports in agreed formats.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below; including Root Cause Analysis (RCA), and Status of Corrective Action Plan (CAP) Implementation and closure.</li> <li>• Status of agreed actions under ESCP.</li> <li>• Status of implementation of ESMP, Biodiversity Management Plan, RAP (including status of land acquisition process) and CAP, supervision and reporting including associated facilities in agreed formats.</li> </ul>	Submit Quarterly Progress Reports (QPR) on E&S to the Bank throughout Project implementation, commencing after the Project Effective Date. Submit each report to the Bank no later than fifteen (15) days of the end of each reporting period.	GMRL
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and GC to submit monthly monitoring reports on E&amp;S performance to GMRL in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank on quarterly basis.</p>	Submit quarterly reports to the Bank	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of SEA/SH; or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank and implement a Corrective Action Plan(CAP) that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>a. Notify the Bank no later the 48 hours after learning of the incident/accident. Provide available details upon request.</p> <p>b. Submit Investigation / RCA with CAP to the WB no later than 10 days from the time of the initial notice unless a different timeframe is agreed to in writing by the Bank.</p>	GMRL
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>Update, disclose and implement the Environmental and Social Impact Assessment (ESIA) for the entire corridor (29.05 km) and corresponding ESMP, consistent with the relevant ESSs.</p> <p>Update and redisclose the ESIA and other E&amp;S documents including details of the proposed new Spur to Gurgaon Railway Station (1.8km) upon finalization of the design.</p> <p>Prior to the commencement of any works or activities on the site, the ESIA and ESMP will be updated based on detailed design. The updated ESIA will incorporate any necessary mitigation measures and management plans to</p>	<p>Update and disclose the ESIA prior to the commencement of any respective Project activities. Prepare the ESMP and incorporate the ESMP as part of the respective bidding and contract documents prior to the carrying out of any Project activities that requires the preparation of such ESMP, and thereafter implement the ESIA and ESMP throughout Project implementation.</p>	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>prevent, minimize, or offset adverse impacts, ensuring compliance with relevant E&amp;S standards and regulations.</p> <p>In case of any other subprojects under GMRP, GMRL shall undertake E&amp;S screening, update ESIA, and prepare site-specific ESMP for implementation and submit to the Bank for approval.</p> <p>Include ESMP and ESHS clauses in the Tender &amp; Contract documents and implement.</p> <p>Contractor is required to prepare the Contractors/Construction ESMP (C-ESMP) for the Project, consistent with the relevant ESSs and updation of ESMP for associated facilities, get clearances, and implement. C-ESMP to be cleared by GC before initiating implementation.</p> <p>Select C-ESMPs requested by the Bank shall be sent to Bank for agreement.</p>		
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including inter alia, ESIA/ESMP, the Labor Management Procedure (LMP), Biodiversity Management Plan and code of conduct into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms allocate adequate budget, deploy qualified personnel, comply with E&amp;S requirements, and require their subcontractors also comply with the E&amp;S specifications of their respective contracts. Submit copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p> <p>Copies of the relevant contracts shall be provided to the Bank upon request.</p>	GMRL
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project including Biodiversity Management of Basai Key Bird Area (KBA)</p>	Throughout Project implementation.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>and Basai Pond and any other activities that may be agreed during Project implementation in accordance with terms of reference acceptable to the Bank and consistent with the ESSs. Thereafter, prepare and finalize the output of such activities in compliance with the terms of reference.</p> <p>Ensure that E&amp;S risk screening is carried out in line with ESSs and that the measures are duly incorporated into the reports.</p>		
1.4	<p><b>ASSOCIATED FACILITIES</b></p> <p>a. Ensure that activities in the identified associated facilities: (a) 15.5 km stretch of the Metro line with 14 stations and the ramp to the Depot already tendered out by GMRL (first civil works package - are carried out in accordance with the applicable requirements of the ESS and this ESCP, including, inter alia, the ESIA, ESMPs, BMP, LMP, management of contractors, RAP, SEP, and the mitigation measures identified in the for the works and metro operations including near Basai KBA and Basai Pond.</p>	As part of the preparation of procurement documents and respective contracts or before commencement of civil works under GMRL-funded first civil works, and thereafter implemented throughout Project implementation.	GMRL
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>a. Adopt and implement a standalone Labour Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, EHS policy, OHS, including critical controls for high energy hazards and other hazards identified through Hazard Assessment in line with National/State regulations and guidelines, WB OHS requirements and Good International Industry Practices (GIIP), personal protective equipment (PPE), and emergency preparedness and response, code of conduct (including relating to SEA and SH), forced labour, child labour, GM for Project workers and applicable requirements for contractors, subcontractors and supervising firms.</p>	a. Adopt and disclose LMP prior to Appraisal completion, and implement the LMP throughout Project implementation.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b. Preparation of a Contractors' Labour Management Plan for each contract, in line with LMP to be submitted to the GC for review and approval, and subsequently implemented.</p> <p>c. For all relevant Project activities involving primary supply workers, include provisions with respect to safety and avoidance of forced and child labour in the bid and contract documents and monitor their implementation in accordance with the LMP.</p> <p>d. Undertake an audit of LMP and implement corrective measures for both Project &amp; Associated Facilities.</p>	<p>b. Approve Contractors' Labour Management Plan prior to carrying out any Project activities by the Contractor, and thereafter implement the Contractors' Labour Management Plan throughout the contract validity.</p> <p>c. As part of the preparation of procurement documents and respective contracts, and monitored throughout Project Implementation.</p> <p>d. Complete the audit not later than one (1) month after the Project Effective Date, and implement corrective measures within agreed-upon timeframe in the audit.</p>	
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Require contractors and subcontractors to prepare and implement an OHS Management Plan in line with the ESMP, LMP, applicable National and State regulations, and the WB EHS Guidelines, in form and substance acceptable to the WB and the GC.</p>	Prepare and approve the OHS Management Plan prior to commencement of civil works and thereafter implement the OHS Management Plan throughout Project implementation.	GMRL
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Contractors are required to establish and operate a GM for project workers, as described in the LMP and in accordance with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers, and thereafter maintain and operate it throughout Project implementation.	GMRL
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE AND WASTE WATER MANAGEMENT PLAN</b></p>	Prepare and approve WWMP prior to the commencement of Project works and associated facilities, and thereafter implement the WMP throughout Project implementation.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare, adopt and implement a Waste and Waste water Management Plan (WWMP) for all hazardous and non-hazardous wastes and waste water generated from offices, stations, depots, construction, and O&amp;M activities and associated activities (including construction and demolition (C&amp;D) waste, plastics, chemicals, batteries, e-waste, hazardous wastes, biodegradable and non-biodegradable wastes, biomedical wastes, sludge, inerts, rejects, etc.). The WMP shall detail the quantity, quality, and management of expected wastes, required permits/consents and associated timeframes, safe storage, segregation, collection, transportation, recycling of wastes in approved recycling plants, reuse and treatment, disposal of wastewater and effluents from all facilities. reuse of C&amp;D wastes in line with the ESMP, applicable National and State Regulations and WB EHS Guidelines. The WMP shall be prepared in form and substance acceptable to the Bank and the GC.</p>		
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP, including sourcing of construction and other materials, management of sources, safe storage, transportation, use and end-of-life disposal without pollution of any environmental components, prevention of disturbances to land/natural resources, low-lying areas, H&amp;S, and biodiversity impacts.</p> <p>In case presence of any contaminated sites in the project area/sites, including due to the historical drainage (from the STPs/ETPs etc), screening and Remediation Plan for Contaminated sites shall be undertaken prior to start of works to ensure any liabilities are managed in line with National Regulations and Guidance</p>	Same timeframe as for the preparation, updation, and implementation of the ESMP.	GMRL
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks in accordance with the ESMP, National and State regulations, WB EHS Guidelines, and GIIPs to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including traffic and work zone safety, air/noise/vibration impacts on communities; behavior of Project workers, risks associated with labor influx and response to emergency situations, etc., and include mitigation measures into the ESMPs.</p>	Same timeframe as for the preparation, updation and implementation of the ESMP.	GMRL
4.3	<p><b>SEA/SH RISKS</b></p> <p>Adopt and implement a SEA/SH Action Plan, as part of ESMP, to assess and manage the risks of SEA/SH.</p>	Same timeframe as for the preparation and implementation of the ESMP.	GMRL
4.4	<p><b>DISASTER MANAGEMENT PLAN AND EMERGENCY RESPONSE PLAN</b></p> <p>Prepare a Disaster Management Plan (DMP) and Emergency Response Plan (ERP) for entire corridor covering all emergencies with Standard Operating Procedures (SOPs) for natural disasters and other emergencies, consistent with the ESSs and applicable National and State Regulations.</p>	Prepare the DMP and ERP for entire corridor no later than 3 (three) months after the Project Effective Date and thereafter implement the DMP and ERP throughout Project implementation, O&M.	GMRL
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLAN</b></p> <p>a. Adopt and implement a Resettlement Action Plan (RAP) in accordance with ESS5 to address identified resettlement issues in Project activities.</p>	a. Prepare and disclose draft RAP by Appraisal completion, and update the RAP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided. Implement the RAP throughout Project implementation.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b. GMRL shall provide details of corridor where ROW has been cleared (currently unknown) prior to Bank's approval of RAP, undertake a Compliance Audit and prepare a Corrective Action Plan (CAP) to mitigate resettlement issues, in accordance with the RAP.</p> <p>c. Establish an Escrow Account for payment of compensation for absentee Title Holders, if any, before commencement of compensation and assistance payments, consistent with ESS5.</p>	<p>b. Undertake a Compliance Audit and prepare a Corrective Action Plan (CAP) prior to approval of the Project by Bank's Board.</p> <p>c. Establish an Escrow Account prior to the commencement of land acquisition and maintain the Escrow Account until full compensation payments have been made.</p>	
5.2	<p><b>GRIEVANCE MECHANISM</b></p> <p>Establish and operationalize a GM to address resettlement-related complaints, as described in the RAP and SEP. The contact details (email id and mobile/phone no.) of GM committee and contractors to be displayed at construction site.</p>	Establish and operationalize the GM by Appraisal completion, and thereafter maintain and operate the mechanism throughout Project implementation.	GMRL
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Adopt and implement a Biodiversity Management Plan (BMP for Project activities and associated facilities) as part of ESMP, consistent with ESS6, with a focus on tree cutting and compensatory plantation, biodiversity management, obtaining clearances, implementing permit conditions for designated forest patches (or any other areas if applicable) used for the Project. The BMP shall be adopted in consultation with relevant stakeholders.</p>	Same timeframe as for the preparation and contract implementation of the ESMP.	GMRL
6.2	<p><b>BIODIVERSITY ASSESSMENT FOR BASAI KBA/IBA</b></p> <p>Conduct an Integrated Biodiversity Assessment (with critical habitat assessment) to prepare a BMP for Basai KBA/IBA (adjacent to the Proposed alignment of spur part of CC01), and bird-friendly design guidelines for implementation.</p>	Preparation no later than three (3) months after the Project Effective Date, and implementation during the Project period.	GMRL

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.3	<p><b>IMPACT AVOIDANCE AND MITIGATION PLAN FOR PONDS/LAKES</b></p> <p>Prepare and implement an Impact Avoidance and Mitigation Plan for Ponds/Lakes, including the Basai Pond.</p>	Prepare prior to finalizing the detailed design of metro lines near ponds/lakes, and thereafter implement throughout Project implementation.	GMRL
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>For any Cultural Heritage identified as impacted by Project activities or associated facilities, prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP, in accordance with the Project's ESIA and consistent with ESS8.</p>	Same timeframe as for the preparation and implementation of the ESMP.	GMRL
8.2	<p><b>CHANCE FINDS</b></p> <p>Prepare and implement the chance finds procedures as part of the ESMP, and consistent with ESS8 and applicable National and State Regulations.</p>	Same timeframe as for the preparation and implementation of the ESMP.	GMRL
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Prepare, disclose and implement SEP for the Project, consistent with ESS10. The SEP shall include measures to, inter alia, provide stakeholders that may be impacted with timely, relevant, understandable, and accessible information and consult with them in a culturally appropriate manner, that is free from manipulation, interference, coercion, discrimination and intimidation.</p>	Disclose the SEP by Appraisal completion, and thereafter implement the SEP throughout Project implementation.	GMRL
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>a. Establish, publicize, maintain and operate an accessible GM to receive and facilitate the resolution of concerns and grievances related 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.</p>	Establish and operationalize the GM by Appraisal completion, and thereafter maintain and operate the mechanism throughout Project implementation.	GMRL

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
b. The GM shall be equipped to receive, register and facilitate the resolution of SEA/SH complaints, including the referral of survivors to relevant GBV service providers, all in a safe, confidential and survivor-centered manner.		
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>		
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> <li>• Ensure the implementing agencies have qualified and experienced staff and adequate resources to support the management of environmental, social, and health and safety risks and impacts of the Project (Action A).</li> <li>• Preparation of C-ESMP for the Project, consistent with the relevant ESSs. (Action 1.1) and updation of ESMP for associated facilities (Action 1.5).</li> <li>• For all associated facilities, update ESMP post detailed design and implementation by GMRL. Facilitate the ESMP implementation, monitoring, reporting and supervision for all associated facilities (Action 1.5).</li> <li>• Issuance of order by GMRL on adopting the RAP and notifying its provisions to relevant partner agencies, such as the Haryana Shahari Vikas Pradhikaran (HSVP) and the Revenue Department.</li> <li>• For sections of the corridor where ROW has been cleared prior to Bank’s approval of RAP, undertake a Compliance Audit and prepare a Corrective Action Plan (CAP) to mitigate resettlement issues as per provision of the final Bank approved RAP.</li> </ul>		