

**MANAGEMENT RESPONSE TO
SECOND REQUEST FOR INSPECTION PANEL REVIEW OF THE
INDIA: RURAL WATER SUPPLY AND SANITATION PROJECT FOR LOW INCOME
STATES (P132173)**

Management has reviewed the 2nd Request for Inspection of the India: Rural Water Supply and Sanitation Project for Low Income States (P132173), received by the Inspection Panel on December 12, 2018 and registered on December 18, 2018 (RQ18/07). Management has prepared the following response.

January 18, 2019

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ABBREVIATIONS AND ACRONYMS

ASHA	Accredited Social Health Activist
BP	Bank Procedure
DBOT	Design, Build, Operate, Transfer
DPMU	District Project Management Unit
DPR	Detailed Project Report
DWSD	Drinking Water and Sanitation Department (Jharkhand)
EA-EMF	Environmental Assessment-Environmental Management Framework
EDS	Environmental Data Sheet
EMP	Environmental Management Plan
ESR	Elevated Storage Reservoir
GoI	Government of India
GP	Gram Panchayat
IDA	International Development Association
IPN	Inspection Panel
LIS	Low Income States
MVS	Multi-Village Scheme
MVWSC	Multi-Village Water and Sanitation Committee
NPMU	National Project Management Unit
NRDWP	National Rural Drinking Water Program
O&M	Operation and maintenance
OP	Operational Policy
PAD	Project Appraisal Document
PESA Act	Panchayat Extension to Scheduled Areas Act
PRI	Panchayati Raj institutions
RWSS	Rural Water Supply and Sanitation
SMF	Social Management Framework
SPMU	State Project Management Unit
SVS	Single Village Scheme
TDIP	Tribal Development Implementation Plan
TDP	Tribal Development Plan
UP	Uttar Pradesh
VWSC	Village Water and Sanitation Committee
WTP	Water treatment plant

Currency Unit

As of January 18, 2019

US\$1.00 = INR71.26

INR 1 = US\$0.014

EXECUTIVE SUMMARY

Request for Inspection

- i. On December 18, 2018, the Inspection Panel registered the Second Request for Inspection (IPN Request RQ18/07) concerning the India: Rural Water Supply and Sanitation Project for Low Income States Project (RWSSP-LIS, or the Project). The first Request for Inspection (IPN Request RQ18/06) was registered by the Inspection Panel on November 5, 2018. While the grievances voiced in the two Requests for Inspection share points of similarity, and while both requests came from tribal communities in the vicinity of Jamshedpur, Jharkhand's largest city, it is important to stress that the two Requests for Inspection pertain to two different multi-village water supply schemes (MVS). The first Request pertains to the Bagbera MVS. The Second Request pertains to the Chhotagovindpur MVS. The two MVSs are being built by the same contractor under one contract and some of the key project documentation, such as the Environmental Management Plan (EMP) was prepared under the joint title of "Chhotagovindpur-Bagbera MVS."
- ii. The Second Request was submitted by residents of Purani Basti, a tribal habitation in the South Sarjamda Gram Panchayat (GP) in the State of Jharkhand. The Request relates to the construction of an elevated storage reservoir (ESR) for the Chhotagovindpur MVS (the construction of which is virtually completed) on government land in Purani Basti, one of eight habitations of the South Sarjamda GP. The Requesters allege, among other things, that they have not been appropriately consulted regarding the selection of the ESR site and that the assessment of the site, which they have been using for a number of community and cultural functions, was insufficient. They also allege that they were threatened with dire consequences when they attempted to protest the construction of the ESR. They further claim that environmental impacts of the construction and operation of the ESR have not been sufficiently studied. The Request demands a stop to construction and the removal of the ESR.

The Project

- iii. **Development Objective.** The Project aims to bring clean, safe drinking water and improved sanitation to vulnerable rural communities where unclean water and poor sanitation are causing disease and contribute to protracted poverty. The Project development objective is to improve piped water supply and sanitation services for selected rural communities in four low income states, namely Assam, Bihar, Jharkhand, and Uttar Pradesh, through decentralized delivery systems, and to increase the capacity of the states to respond promptly and effectively to an eligible crisis or emergency. The Project currently supports rural water supply and sanitation programs in 33 districts in the four states and is expected to directly benefit about 7.8 million rural people, including tribal populations and about 3.8 million women.
- iv. The RWSSP-LIS is the first large project in the low income states that aims to improve access to sustainable water and sanitation services for the rural poor through a decentralized approach to encourage inclusion and equity. The Project targets states with a very low level of access to tap-supplied drinking water; as of the 2011 census, tap water coverage is only 3.7 percent in Jharkhand, the state concerned by the Request, compared to 32 percent for the country as a whole.
- v. **Components.** The Project is supported by a US\$500 million IDA Credit. It has four components, including capacity-building and sector development; infrastructure development;

project management support; and contingency emergency response. *Component B: Infrastructure Development* (US\$860 million total; IDA contribution US\$430 million) supports investments for improving water supply and sanitation coverage, including construction of new infrastructure and rehabilitation and augmentation of existing schemes. While most of the water supply schemes under the Project serve single villages, the Project also supports several MVSSs, which mainly rely on surface water sources and are developed for large service areas encompassing habitations where currently used local groundwater sources are not sustainable or not of acceptable quality.

- vi. **Project Status.** The Project was approved by the Bank's Board on December 30, 2013, and is scheduled to close on March 31, 2020. The Project has disbursed 22 percent of the IDA funds allocated to it. The Project is currently implementing 919 drinking water schemes: 897 Single Village Schemes (SVSSs) and 22 MVSSs, of which 182 SVSSs and two MVSSs are in the State of Jharkhand. The 182 SVSSs in Jharkhand are about 75 percent completed. The two MVSSs are Chhotagovindpur (95 percent completed) and Bagbera (70 percent completed). These two distinct MVSSs are being built under a single US\$32 million equivalent Design, Build, Operate and Transfer (DBOT) contract. Jointly, the two MVSSs are designed to supply a total of 445,000 rural people across 38 GPs with 24/7 piped water supply, consistent with Project design for all MVSSs. The Chhotagovindpur MVSS started operational trial runs in December 2018 and the Bagbera MVSS is expected to start its trial runs in March 2019.¹ The Chhotagovindpur MVSS is designed to supply over 345,000 rural people across 21 GPs.
- vii. **Implementation Arrangements.** Implementation of the Project is carried out through institutional and procedural arrangements at the national, state, district and local levels. The local level of implementation encompasses a wide range of players, including elected village councils; Village Water and Sanitation Committees (VWSCs); and community mobilizers who are key to generating awareness of water and sanitation. These local players interact significantly with the District Project Management Unit (DPMU) and contractors to facilitate the implementation of SVSSs, which constitute the vast majority of water supply schemes financed under the Project. For MVSSs, the implementation arrangements also include a Multi-Village Water and Sanitation Committee (MVWSC) which consists of representatives of the individual VWSCs of the GPs included in the service area of the MVSS.
- viii. Implementation arrangements in areas that are classified as tribal areas (known as “Scheduled Areas” in the terminology of the Constitution of India) include an additional level of decentralization and decision-making authority by requiring that any development projects affecting tribal habitations (as sub-units of GPs) need to be discussed and approved at the *gram sabha* (community assembly) of the concerned GP, to be chaired by the tribal leader of the concerned habitation. This aspect of the implementation arrangements is of significance for both Requests for Inspection filed under RWSSP-LIS.
- ix. **Governance and Accountability.** The project design is rooted in the view that devolution of power and decentralization of decision-making authority lead to more equitable and more sustainable development outcomes. As noted in the Project Appraisal Document (PAD), “although the 73rd Constitutional Amendment promotes service provision to be decentralized to local governments (*Panchayati Raj Institutions* – PRIs), most of the work of designing, implementing and operating RWSS schemes continues to be with the state engineering

¹ Formal start of the operations phase will follow the successful completion of the trial runs, which is expected to be about three months after the start of the trial runs, i.e., February 2019 for the Chhotagovindpur MVSS.

agencies through top-down, engineering-based, ‘supply-driven’ approaches, which also adversely impact governance and accountability.” (p. 2) The PAD emphasized “the need to use PRI-based decentralized institutional models for the design, implementation and management of RWSS services,” and that “sustainability is enhanced through inclusive, community-based, participatory, demand-responsive approaches to RWSS service delivery.” (p. 6)

- x. In the case of SVSs, there is a direct and close relationship between the nature and location of the asset that is created and the location and decision-making authority of the beneficiaries of the scheme. In the case of MVSs, which serve large numbers of GPs, this relationship is not as obvious and there is a tension between the governance and accountability objectives of the Project and the technically and legally more complex nature of the asset which serves beneficiaries in different GPs. MVSs are also implemented through more complex contractual arrangements that include provisions for operation and maintenance (O&M) by the contractor. In the case of the two MVSs in Jharkhand, the greater complexity of the assets has served to perpetuate the top-down, engineering-based approach that the Project has sought to change in favor of a community-driven approach to decision-making and asset management. The MVWSC, which represents the collective interest of the GPs served by the MVS, was not established before the start of the works as was planned and therefore could not counterbalance the usual top-down, engineering-based approach.

Management Response

- xi. Management has carefully reviewed the claims that were raised in the Request, which were also raised in a separate email communication to the Bank in October 2018. After this first communication, Management requested the Project Management Unit to follow up on the concerns and in October and December 2018, Management met with the Requesters and the community to better understand their concerns and discuss ways to address them. ***Based on its own review and site visits, Management has concluded that there have been shortcomings with regard to compliance with Bank safeguard policy requirements in the implementation of the Project component involving construction of the ESR in the vicinity of Purani Basti, a mixed tribal/non-tribal habitation that is part of the South Sarjamda GP.*** These shortcomings pertain to weaknesses in design and supervision, the conduct and documentation of consultations, the disclosure of key scheme-specific documents, non-objection to the initiation of works ahead of an approved EMP, and failure to apply the Bank’s policy on Physical Cultural Resources (OP 4.11). In particular, Bank supervision efforts underestimated the complexity of the implementation of the MVSs in the tribal areas of Jharkhand. A corrective action has been included in the action plan.
- xii. ***Consultations for scheme site selection.*** Management notes that there were significant efforts by the Project and by state and district authorities to ensure consultations among affected communities with respect to the decision to develop the Chhotagovindpur MVS and its design. The decision to construct the scheme was driven by strong demand across the 21 participating GPs. Strong demand for the Project is evidenced by the number of households that have opted to participate in the scheme to obtain clean and safe drinking water. Management acknowledges, however, that there appear to have been weaknesses in consultation and its documentation at the level of Purani Basti habitation. In addition, no *gram sabha* (community assembly) was held at the GP level to provide the community’s “no objection” to the siting of the ESR. Other meetings and consultations were held about the MVS and the ESR but only the

gram sabha of the GP has the statutory authority to provide the “no objection” of the impacted community.

- xiii. Management notes that while DPMU officials became aware of the objections of some Purani Basti residents to the siting of the ESR in August 2015, and attempted to address these objections through various subsequent consultations with people living in the vicinity of the service area of the ESR, it is not clear whether the residents of Purani Basti who objected to the siting of the ESR participated in these meetings. Moreover, despite the efforts of project and district officials, it is evident that significant disagreement persists between different members of the community. Most of the households planned to be connected to the scheme have already paid their community contribution and are already connected (680 households out of 886, or 77 percent). At the same time, some residents of Purani Basti continue to object to the presence of the ESR. Given these differences and the weaknesses in documentation of the consultation process, Management is not able to confirm unambiguously that broad community support, as required by OP 4.10, was achieved.
- xiv. ***EMP preparation and consultations.*** In line with the Project’s Environmental Assessment-Environmental Management Framework (EA-EMF), the responsibility to develop the EMP rests with the district government. In the case of MVSSs, the practice under the Project has been to delegate the preparation of the EMP to the contractor, while approval remains with the government authorities. As per agreed implementation procedures, however, a preliminary EMP based on the preliminary design of the scheme should have been attached to the Detailed Project Report (DPR) to inform the bidding process, in addition to the Environmental Data Sheet (EDS). This was not done, and the Bank missed an opportunity to ensure that it was developed upfront before providing its “no objection” as part of the procurement prior review process of the DBOT contract.
- xv. ***Management further acknowledges that the scheme-specific EMP should have been finalized prior to the start of the works in October 2016.*** A single EMP for the Chhotagovindpur and Bagbera schemes was prepared by the contractor. This EMP was originally submitted for government approval in July 2015 and approved by district authorities in 2017. The Project Agreement between the Bank and the Government of Jharkhand also requires that scheme-specific EMPs be submitted to the Bank for prior review and approval. In this case, this requirement was not met and Management acknowledges that the Bank did not follow up to ensure compliance.
- xvi. These shortcomings in consultations also appear to have contributed to distrust and opposition by some members of the Purani Basti community. These were exacerbated by incorrect assumptions that (a) the Project is part of a broader plan to incorporate the tribal areas into the Jamshedpur urban agglomeration; (b) the Project will negatively impact the volume of local water sources; and (c) these local water sources that are now used by the community for free would no longer be available without charge.
- xvii. ***Physical Cultural Resources.*** Management acknowledges that OP 4.11 was not applied to the Project. According to the Requesters, the Romantic Maidan, the local name of the field in which the ESR is located, was the site of a memorial, composed of boulders, to three men who lost their lives in the movement to establish a separate state for Jharkhand. The Requesters say that these boulders were destroyed when the contractor started works in October 2016 and that the contractor installed three busts in their place to commemorate the men. Accounts differ as to whether the community requested that the contractor finance the busts (as the contractor

asserted) or whether the busts were put up without the consent of the community. Community members stressed that erecting busts or statues or other structures goes against their cultural traditions, which use stones, trees and other natural phenomena as markers of worship and reverence. The Requestors also stated that the Romantic Maidan is used for tribal festivals celebrated annually or less frequently; here, too, other interlocutors challenged this assertion.

- xviii. ***Environmental concerns.*** The Requesters raised two main environmental concerns: (a) impact on groundwater level; and (b) potential contamination in the sludge generated by the operation of the MVS. Management notes that no impacts from the ESR on the groundwater levels in Purani Basti are expected. The water intake point is about eight kilometers away, and the amount of water abstracted is negligible compared to the flow of the Subarnarekha River, from which the water will be drawn. With regard to sludge, as the infrastructure in question is a storage reservoir, there will be no sludge generation. The only infrastructure in the Chhotagovindpur MVS which will generate sludge is the Water Treatment Plant (WTP) of the scheme located in HUDCO park in Jamshedpur, some four kilometers away. This sludge will be handled appropriately and will have no direct impact on the Purani Basti community.
- xix. Management notes that the Request also raises issues pertaining to the Indian Constitution and laws, about which the Bank is not competent to respond. Some concerns also go beyond the scope and objective of the Project, such as the concerns about expansion of Jamshedpur's city limits.
- xx. ***Management regrets the shortcomings in Project design and implementation support and is working closely with the Borrower, state and district authorities to help address the issues.*** Management has reviewed the demand in the Request that construction be stopped and the ESR removed. Based on the information available to it including the evidence of strong demand for the MVS, Management is of the view that stopping the scheme works could pose a risk of retaliation against those opposing the scheme from those who are supportive of and expecting the scheme to begin providing piped water soon, including in other GPs. Management is committed to support the Government of Jharkhand in discussing options with the concerned community to achieve a satisfactory resolution.
- xxi. ***Concerns about Expansion of the City Limits of Jamshedpur.*** Management understands the Requesters' concerns regarding urban expansion and the perceived threat of tribal villages losing certain legal protections afforded to them as Scheduled Areas by being integrated into the city. Purani Basti is located on the fringes of Jamshedpur city, the largest urban center of the State of Jharkhand and India's 36th-largest urban agglomeration. Management understands that the Government is considering the expansion of city limits for purposes of regional planning and integration. However, there is no link between the mentioned draft master plan to expand the Jamshedpur urban area and this Project, which aims to provide water to rural communities, nor was it mentioned during consultations that took place during Project preparation. This issue is beyond the scope of the Project
- xxii. Management commits to the following specific actions:
 - Actions specific to the second Request for Inspection:*
 - In direct response to community concerns:*
 - By end-February 2019: Management will support the Government of Jharkhand to consult with concerned members of the Purani Basti, South Sarjamda community on the ESR to better understand their concerns and to identify and agree on possible measures to address

Project-related impacts. Such measures may include support for the following:

- ensuring that a survey is carried out to identify households in service areas not within reach of a distribution line, and extending the scheme to provide service to households that wish to join it;
 - potentially developing the Romantic Maidan as culturally appropriate, and in consultation with the affected communities including the Requesters;
 - undertaking a discussion with the community and its traditional tribal leaders as to what constitutes an appropriate memorial and exploring re-installation of boulders for the three martyrs or ritually shifting the martyrs' boulders to another sacred site;
 - providing other culturally appropriate benefits to the community.
- By end-February 2019: Management will support the State Project Management Unit (SPMU) to review and update existing Information, Education and Communication (IEC) materials (including basic information about the Project and its expected benefits as well as about water, sanitation and hygiene in general) to consider existing community concerns, and to finalize preparation of the IEC materials in Santhali and Ho, the most widely spoken tribal languages in this area.
 - By end-March 2019: Management will work closely with the SPMU and DPMU to ensure that appropriate consultations on the updated EMP and disclosure are carried out. The update of the EMP will also reflect the feedback from the above-cited detailed consultations with the Purani Basti community.
 - By end-March 2019, Management will complete a review of the processes followed to document community “no objection” to the siting of significant infrastructure (WTPs, ESRs) associated with the two MVSs in Jharkhand.

To address overall project shortcomings:

- By end-March 2019: Management will support the SPMU to disclose the current design of the water schemes and the plan to extend the distribution network to allow coverage of households interested in a water connection in all 21 GPs of the service area.
- By end-March 2019: Management will hire experts in anthropology and cultural heritage with local experience to assist the Bank team in overseeing the implementation of the Tribal Development Plan (TDP) and Tribal Development Implementation Plan (TDIP) and the social audit that the SPMU and DPMU will be carrying out.
- By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to hire an agency to support consultation and regular training on environmental and social issues and the TDP.

xxiii. In addition, the following actions included in the Management Response to the First Request for Inspection are also relevant to the remedial actions to address the concerns raised in the Second Request:

In direct response to community concerns:

- By end-February 2019: Management will support the Government of Jharkhand to undertake implementation stage consultations in all GPs covered by the Bagbera and

Chhotagovindpur MVSs to update community members on implementation progress. This will allow further scheme information to be provided; clarify aspects related to environmental and tribal development management; as well as provide information on the start of service delivery, and financial aspects related to community contribution and water tariffs, in addition to responding to people's queries.

- By end-February 2019: Management will complete a review of the revised draft updated EMPs for the Chhotagovindpur and Bagbera MVSs, which the DPMU has committed to submit to the Bank for review by end-January 2019.
- By end-March 2019: Management will request the DPMU to share the results of the water analysis at the water intake with the community and make them publicly available as part of the EMP.

To address overall project shortcomings:

- By end-February 2019: Management will ensure that executive summaries of safeguard documents are translated and disclosed in Hindi, the predominantly read language in the Project areas, on the relevant department website, at the head office of each GP and at the offices of the contractor.
- By end-January 2019: Management will follow up with the SPMU and DPMU to ensure completion of the review of the scope of works and training of the 400 Community Organizers (CO) that have been placed in all five districts of Jharkhand since May 2018, to give them a greater role in disseminating information about the Project, relaying community concerns, and in environmental and social monitoring. This review will also cover Project and site-level GRMs and identify steps to strengthen them.
- By end-February 2019: Management and PMUs will complete the ongoing comprehensive review of safeguard compliance of the Category 2 schemes supported by the Project, which includes all of the MVSs in addition to some SVSs, and will prepare an action plan for time-bound implementation of any remedial measures that may be required. Priority is being given to completing the reviews of the safeguard documentation for the Chhotagovindpur and Bagbera MVSs, including the EMPs, and any remedial action pertaining to these MVSs will need to be addressed before the MVS starts operation.
- By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to ensure adequate staffing and staff capacity strengthening for appropriate monitoring of EMP implementation and application of safeguards instruments.
- By end-March 2019: completion of Project restructuring, which will include the application of OP 4.11 among other aspects.

I. INTRODUCTION

1. On December 18, 2018, the Inspection Panel registered a Request for Inspection, IPN Request RQ18/07 (hereafter referred to as “the Request”), concerning the India: Rural Water Supply and Sanitation Project for Low Income States (P132173), financed by the International Development Association (the Bank).

2. ***Structure of the Text.*** The document contains the following sections: Section II presents the Request; Section III provides background information on the Project, and Section IV contains Management’s response. Annex 2 contains a map, a schematic of the water supply scheme, historical satellite images and a picture of the construction site before construction started. Annex 3 is documentation on the Project consultation process, including photos and video links. Annex 4 presents a timeline of Project-related events.

II. THE REQUEST

3. The Request for Inspection was submitted by Santhal and Ho tribal community members from a habitation in the State of Jharkhand, India (“the Requesters”). The Requesters have asked for confidentiality.

4. The Request relates to the construction of an elevated storage reservoir (ESR) for the Chhotagovindpur Multi-Village Scheme (MVS), which is being built in the vicinity of Purani Basti, one of eight tribal habitations of the South Sarjamda Gram Panchayat (GP, rural government). The Requesters allege, among other things, that (i) they were not appropriately consulted regarding the selection of the ESR site, which is located on government land that they have been using for some community functions; and (ii) the assessment of the site was insufficient. They also allege that when they were threatened with dire consequences when they attempted to protest the construction of the ESR. They further claim that environmental impacts of the construction of the ESR have not been sufficiently studied and that, therefore, the Environmental Management Plan (EMP) is inadequate. The Request makes several demands, including a halt to construction, removal of the ESR and restoration of the site to its original state.

5. No further materials were received by Management in support of the Request.

6. On November 5, 2018, the Inspection Panel registered the first Request for Inspection (IPN Request RQ18/06) under the Rural Water Supply and Sanitation Project for Low Income States. The Management Response to Request RQ18/06 was submitted to the Inspection Panel on December 11, 2018. The First Request also pertains to a tribal habitation in the vicinity of the city of Jamshedpur, Jharkhand. However, it refers to a different MVS, the Bagbera MVS, which is being built under one contract by the same contractor as the Chhotagovindpur MVS. Some of the key project documentation, such as the EMP was prepared under the joint title of “Chhotagovindpur-Bagbera MVS.” The two water supply schemes are both in the environs of Jamshedpur and the social structure of the communities served by the two schemes is broadly similar in that it represents a mix of tribal and non-tribal households. But these are two different

water supply schemes and the two Requests for Inspection pertain to different types of infrastructure—a water treatment plant (WTP) in the first case and an ESR in the second case).

III. PROJECT BACKGROUND

7. **Project Objectives.** The Project aims to bring clean, safe drinking water and improved sanitation to vulnerable communities where unclean water and poor sanitation are causing disease and contribute to protracted poverty. The Project development objective is to improve piped water supply and sanitation services for selected rural communities in target (low-income) states through decentralized delivery systems and to increase the capacity of the participating states to respond promptly and effectively to an eligible crisis or emergency.

8. **Project Components.** The US\$500 million Project is to be implemented over a six-year period. It supports the implementation of the National Rural Drinking Water Program (NRDWP) of the Ministry of Drinking Water and Sanitation, Government of India (GoI) for improving piped water and sanitation coverage nationwide. The Ministry has prioritized the Bank Project to support NRDWP implementation in four low income states, namely Assam, Bihar, Jharkhand, and Uttar Pradesh (UP). These states were selected based on: (i) low levels of rural piped water coverage; (ii) water quality problems; and (iii) number of districts afflicted with Acute Encephalitis Syndrome and Japanese Encephalitis. The Project comprises the following components:

- (a) *Component A: Capacity Building and Sector Development (Cost US\$93 million; IDA contribution US\$46 million).* This component supports the building of institutional capacity for implementing, managing and sustaining Project activities, along with sector development studies to inform policy decisions.
- (b) *Component B: Infrastructure Development (Cost US\$860 million; IDA contribution US\$430 million).* This component supports investments for improving water supply and sanitation coverage, including construction of new infrastructure and rehabilitation and augmentation of existing schemes. Water supply investments include water source strengthening and catchment area protection activities. Most habitations (sub-GP-level hamlet) are served by Single Village Schemes (SVS) using local groundwater sources. MVSSs, mainly relying on surface water sources, are developed for large service areas encompassing habitations where the local source is either not sustainable or not of acceptable quality. The sanitation component supports the Swachh Bharat Mission-Gramin (Rural), which is the rural part of the Clean India Campaign, through activities including soak-pits, drain and lane improvements, and community awareness programs for improving sanitation and hygiene practices. The Project promotes 24/7 and metered water supply and the introduction of the use of solar energy in the RWSS sector.
- (c) *Component C: Project Management Support (Cost US\$47 million; IDA contribution US\$24 million).* This component includes Project management support to the various entities at the national, state, district, and village levels for implementing the Project, including staffing, consultancy and equipment costs, and internal and external financial audits.

- (d) *Component D: Contingency Emergency Response (Cost US\$0 million)*. Following an adverse natural event that causes a major natural disaster, the Government may request the Bank to re-allocate Project funds to support emergency response and reconstruction. This component has not been mobilized to date.

9. **Project Financing.** The Bank is providing half of the funding for the Project. The counterpart funds are being provided as follows: GoI US\$330 million from the NRDWP, participating states US\$162 million in matching funds, per NRDWP guidelines, and community contributions of US\$8 million. To demonstrate ownership for the schemes, participating households contribute a one-time “community contribution” towards capital costs in the amount of INR 450 (US\$6.40) or INR 225 (US\$3.20) for Scheduled Caste or Scheduled Tribe households. The responsibility to set the tariff lies with the GPs. The State guidance is that a minimum monthly operation and maintenance (O&M) tariff of INR 62 (US\$0.90) should be charged at the household level, but GPs have the discretion to charge more. Participation in the scheme is voluntary at the community and household levels.

10. **Project Status.** The Project was approved by the Bank's Board on December 30, 2013. It is scheduled to close on March 31, 2020. The Project has disbursed 22 percent of the funds to date. The Bank performed its 9th Implementation Support Mission in October 2018. The Project is currently implementing 919 drinking water schemes: 897 SVSs and 22 MVSs, of which 182 SVSs and two MVSs are in the State of Jharkhand. The 182 SVS are about 75 percent completed. The two MVSs are Chhotagovindpur (95 percent completed) and Bagbera (70 percent completed). These two distinct MVSs are being built under a single US\$32 million equivalent Design, Build, Operate and Transfer (DBOT) contract. Jointly, the two MVSs are designed to supply 445,000 rural people across 38 GPs with 24/7 piped water supply, consistent with Project design for all MVSs. The Chhotagovindpur MVS started operational trial runs in December 2018 and the Bagbera MVS is expected to start its trial runs in March 2019.² The Chhotagovindpur MVS is designed to supply over 345,000 rural people across 21 GPs.

11. **Project Beneficiaries.** The Project currently supports rural water supply and sanitation (RWSS) programs in 33 districts in Assam, Bihar, Jharkhand, and UP, and is expected to directly benefit about 7.8 million rural people, including tribal populations and about 3.8 million female beneficiaries. The Project will improve the “access and usage” of the water supply and sanitation facilities created in the Project area. Women and children will benefit significantly from the Project interventions as they currently bear a disproportionate burden of securing daily water supplies and dealing with illnesses resulting from poor water and sanitation facilities. The beneficiaries are expected to benefit from Information, Education and Communication (IEC) and Behavior-Change-Communication programs, which promote the adoption of improved sanitation and hygiene practices, including latrine usage. Rural women are empowered to have voice and choice through membership in the Village Water and Sanitation Committees (VWSCs).

12. **Addressing the Low Level of Access to Drinking Water and Sanitation in the Project States.** The Project is the first large project in the low-income states that aims to improve access to sustainable water and sanitation services for the rural population, primarily through a

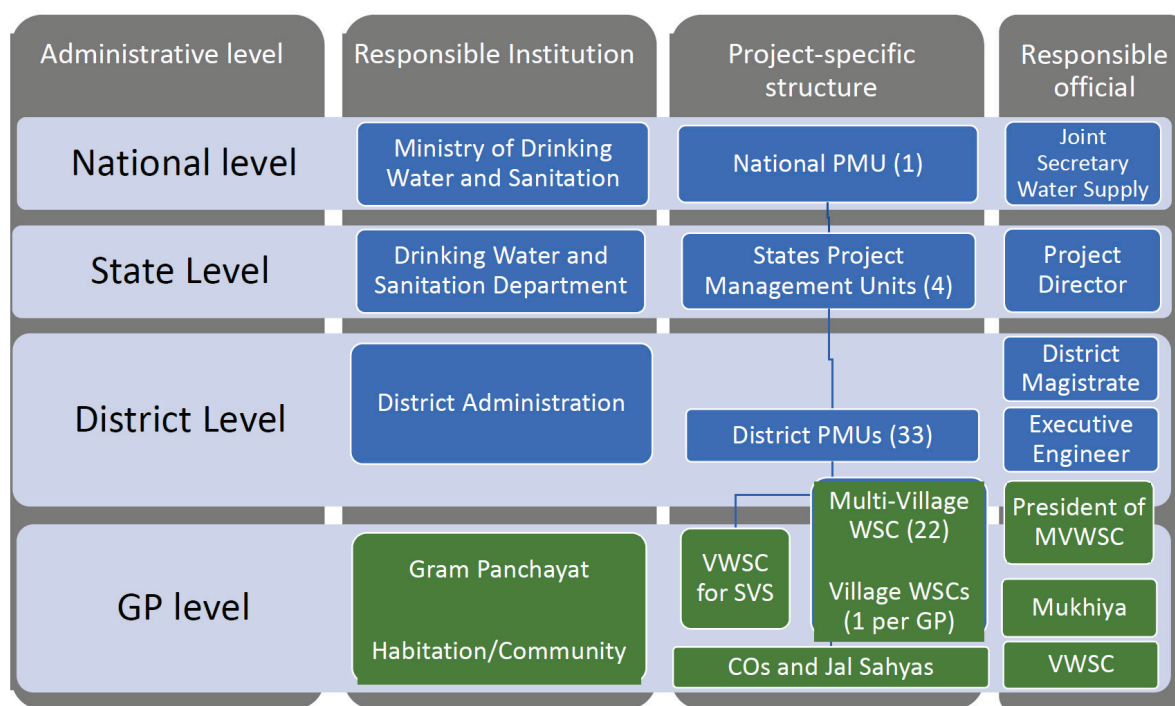
² Formal start of the operations phase will follow the successful completion of the trial runs, which is expected to be about three months after the start of the trial runs, i.e., February 2019 for the Chhotagovindpur MVS.

decentralized approach to encourage inclusion and equity, promoting a high level of service through house connections and introducing new management models for service delivery. This Project has targeted the most under-developed, low income states with a very low level of access to tap-supplied drinking water. As per the 2011 census, tap water coverage was only 2.6 percent in Bihar, 3.7 percent Jharkhand, 6.8 percent in Assam and 20.2 percent UP, whereas coverage in the country as a whole was more than 32 percent. Bihar, Jharkhand and UP also lagged significantly in sanitation, as more than 75 percent of rural households lacked access to latrines on their premises.

13. Groundwater in many locations in Jharkhand contains levels of arsenic, iron, fluoride and nitrates that are detrimental to human health. Poor water quality, including fluoride and iron contamination, is one of the major concerns of local communities. Groundwater in the Jamshedpur area shows iron and nitrate contamination, and isolated cases of radioactivity.

14. ***This Project is promoting 24/7 piped water services to rural areas where such services are now non-existent.*** It targets poor populations, areas where water sources are contaminated, and areas with high tribal populations. The MVSs introduce a new service level in rural areas, with 24/7 availability, water meters, and a new management model, based on public-private partnerships for a DBOT contract including O&M for a period of five years. At the state level, the Project is supporting the state government in putting in place policies for sustainable O&M of water supply and sanitation in rural areas.

15. ***Implementation Arrangements.*** Given the large number of schemes (to date, more than 900 piped water schemes across four states), the low implementation capacity of the participating states and the reliance on a framework approach, implementation of the Project poses a significant challenge. Detailed implementation arrangements were agreed for the Project at the national, state, district and village levels and are detailed in the Project Appraisal Document (PAD). Each participating state has put implementation arrangements under the general aegis of the State Drinking Water and Sanitation Department (DWSD). Of particular relevance to this case are the arrangements at the district and village levels. At the district level, the District Project Management Unit (DPMU), headed by the Executive Engineer in charge of the District, bears responsibility for project implementation on behalf of the DWSD at the district level and the District Water and Sanitation Committee and coordinates the work of various district and state agencies and technical bodies, interfacing with the MVWSC for MVSs, and with the VWSC for SVSs. The MVWSC is composed of representatives of the individual VWSCs of the GPs included in the service area of the MVS. It has the role of endorsing and signing off on scheme design and implementation phase payments. Figure 1 below describes the implementation arrangements at the national, state, district and GP levels.

Figure 1: Project Implementation Structure

16. At the GP level, the key bodies are the GP council, the VWSC and the Support Organization (SO). The GP is responsible for taking all important decisions, including on tariffs, through resolutions at the *gram sabha* meetings, under the overall guidelines given by the State DWSD, at the state and district level. The VWSC, as a sub-committee of the GP, is responsible for design and implementation of SVSs, the intra-village component of MVSSs, and solid and liquid waste management activities, along with the programs for sanitation and hygiene promotion activities. SOs are appointed by the DPMU to assist the GP/VWSC in community mobilization, capacity building and the IEC and Behavior-Change-Communication activities.

17. In order to strengthen support at the grassroots level, Jharkhand has put in place a system of GP-level water and sanitation workers called *jal sahiyas*. These are women community mobilizers, selected by each GP, who are intensively engaged in generating awareness about water and sanitation; facilitating discussions between the representatives of Panchayati Raj Institutions (PRI), the VWSC/MVWSC and the community; and collecting each household's community contribution to the scheme.³ The *jal sahiya* is also the Treasurer of the VWSC and an active participant in all the consultations and meetings held related to the scheme. In the Chhotagovindpur and Bagbera MVSSs, there are 21 *jal sahiyas* and all of them are members of MVWSC and are active.

³ The *jal sahiya* is selected by the GP using the following criteria: primacy is given to women from the “*jal barwa*” (“water filler”) community in a village that also fills water for other households in the village; to daughters-in-law of the village; to women with an education qualification of up to class X; and women between 25 and 45 years old at the time of selection. The post is permanent, ending only in case of death, resignation by the individual or in case there are any proven charges of financial irregularity against her.

18. In addition, 400 Community Organizers (COs) have been placed in all five districts of Jharkhand since May 2018. East Singhbhum counts 142 COs; for the MVSs, there are two COs per GP, hence, a total of 42 for the Chhotagovindpur MVS. Of the two COs covering South Sarjamda GP, one resides in Purani Basti. As per their scope of work, these COs are responsible for community mobilization and sensitization through IEC and capacity-building activities; supporting bookkeeping of the VWSCs and the MVWSCs; facilitating and organizing community-level meetings; ensuring community-level monitoring of water supply and sanitation; and facilitating and ensuring collection of contributions to capital and operating expenditures. Selection criteria for the COs include: education up to matriculation level; between 18-45 years old; enjoying good community rapport. CO posts are first proposed to *jal sahiyas*, then to members of village organizations or self-help groups, and then to other people if none of the previous individuals are interested. A review of the scope of works of the COs is ongoing and consideration is being given to providing them a greater role in disseminating information, relaying community concerns, monitoring environmental and social aspects and strengthening Project and site-level GRMs

19. A VWSC was formed in South Sarjamda in June 2012,⁴ before the initiation of the Project and was instrumental in generating awareness related to water and sanitation. It was reconstituted in 2015 following the panchayat elections in the state. The VWSC has nine members and the *mukhiya* (the elected leader of the GP) is the President of the VWSC. A Vice President is chosen by the GP and this position is reserved for a woman. In the case of the Chhotagovindpur MVS, the MVWSC was formally established in January 2018⁵ (hence, late in the process, as the scheme was already under construction). Although an attempt was made to form the MVWSC soon after the commencement of work related to the MVS in the area, its formation was delayed due to the April 2018 *panchayat* elections. The MVWSC of the Chhotagovindpur scheme is comprised of 42 members, consisting of all the *mukhiyas* and *jal sahiyas* from the VWSCs of the 21 GPs included in the scheme.

20. The Project has a Grievance Redress Mechanism in place at the national level; all state-level PMUS (SPMUs) use multiple modes of grievance redress. In Jharkhand, people can submit their grievances through a toll-free number, through a website⁶ or verbally or in writing to the VWSC, the *mukhiya* or the *jal sahiya*. However, the State-level GRM is new and not well known in rural areas and local GRMs are generally insufficiently monitored and coordinated.

21. ***Local context of the Second Request for Inspection.*** While the First Request for Inspection related to the Water Treatment Plant of the Bagbera MVS, this Second Request relates to the construction of an ESR for the Chhotagovindpur MVS, the second MVS developed under the Project in Jharkhand, near to but distinct from the Bagbera MVS. The Chhotagovindpur MVS will supply a service area spanning 21 GPs in the vicinity of the city of Jamshedpur (population 1.34 million, as of 2011 census), the main town of East Singhbhum District and the largest urban agglomeration in Jharkhand. Jamshedpur has a 24/7 water supply in a substantial part of the city;

⁴ In accordance with the Guidelines issued by Drinking Water and Sanitation Department, Government of Jharkhand: Office order No. 185 dated 24/08/2011.

⁵ As per circular dated 08/NRDWP-43/2013-4003 dated 20.09.2013 issued by Department of Drinking Water and Sanitation, Government of Jharkhand.

⁶ State level GRM through toll-free number (181) or website <http://cmjansamvad.jharkhand.gov.in/>

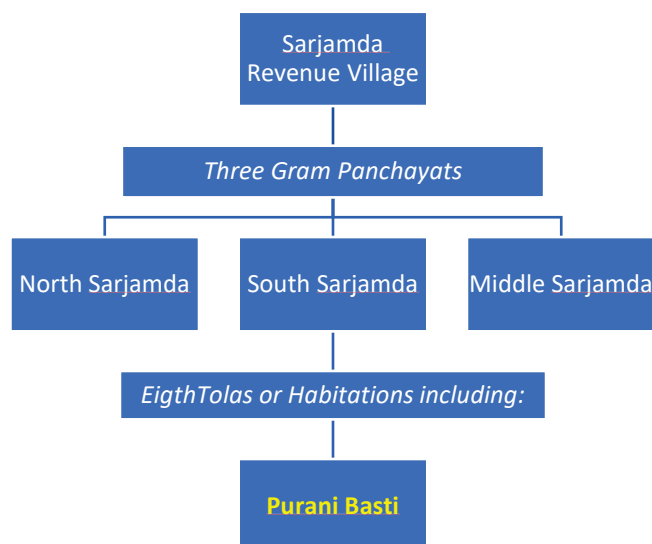
the water supply scheme under the Project was conceived to provide water to unserved rural areas that aspire to the same level of services.

22. The construction and five-year operation of both the Chhotagovindpur and the Bagbera MVSSs was procured as a single DBOT contract. It was awarded to the Chhotagovindpur & Bagbera Drinking Water Supply Project Limited (in this document, the contractor), a special-purpose company created as a joint venture of Infrastructure Leasing & Financial Services (IL&FS), as lead partner (51 percent), and IL&FS Water Limited (49 percent). The contract was signed on May 25, 2015.

23. For purposes of this Management Response, it is important to understand the hierarchy of settlements in the Project area. As noted above, the ESR that is the subject of this Request for Inspection is part of the Chhotagovindpur MVS being built on government land in the vicinity of Purani Basti habitation in South Sarjamda GP. South Sarjamda, North Sarjamda and Middle Sarjamda constitute the Sarjamda revenue village (a revenue village is a small administrative region in India). In addition to South Sarjamda GP, Project beneficiaries are located in 20 other GPs.

24. According to data collected in a survey under the Project, in 2017-18 there were 7,500 people in the South Sarjamda GP (GPs here have at least 5,000 inhabitants each), of which 45 percent are classified as belonging to Scheduled Tribes, about 16 percent as Scheduled Castes and 39 percent as General Population. Within South Sarjamda, there are eight habitations, including Purani Basti, the location of the ESR (see Figure 2).⁷ According to the DPMU, there are 375 households in Purani Basti, which is equivalent to a population of 2,025.

Figure 2. Organigram of Sarjamda Revenue Village Structure



⁷ The others are Chhola Goda, Janegoda, Lupung Tola, Doka Tola, Shankarpur, Nidhir Tola and Jaher Tola.

25. Parts of Purani Basti are not presently included in the planned coverage reflected in the contractor’s scope of work. According to the DPMU, of the 375 households in Purani Basti, 240 are covered by the scheme network (of these, to date 140 households have paid their one-time “community contribution” to connect to the network). The remaining 135 households in Purani Basti, all of which are located in one area, are not included in the Detailed Project Report (DPR) for connection to the scheme. Management’s understanding is that the non-inclusion of these households in the scheme is the result primarily of the reliance of the DPR on population projections from the 2001 census data. In the absence of a household survey, the network drawings were based on maps of roads existing at the time. Since then, there has been growth, including new houses and new roads (sometimes informal). The DPMU is carrying out a survey to identify households not presently included in the distribution network and will propose a contract variation to achieve universal coverage of those households that choose to join the scheme.

26. Within South Sarjamda GP, the ESR is located in the northeast corner of a plot of government land, adjacent to existing government buildings. The land is registered in the records as a field called the “Romantic Maidan.”⁸ The 35m by 35m plot occupied by the construction of the ESR represents less than 14 percent of the total area of the plot (9024 m²).

27. ***Safeguard Approach of the Project.*** The Project was placed in Category B and five of the Bank’s safeguard policies were determined to be applicable to the Project. Of particular relevance to the Request are OP 4.01 on Environmental Assessment and OP 4.10 on Indigenous Peoples. OP 4.11 on Physical Cultural Resources was not applied to the Project as the Environmental Assessment–Environmental Management Framework (EA-EMF) for Jharkhand (see below) and the other three states did not identify any project-induced risks or impacts related to the presence of physical cultural resources. As discussed below Management is now of the view that OP 4.11 should have been applied to the Project.

28. To date, the Project includes a total of 919 piped water schemes across the four states, 551 in what is referred to as Batch I schemes, and 368 in what is referred to as Batch II schemes (an additional 300+ Batch II schemes are at bidding stage). Given the large number of schemes and the fact that most of them had not yet been identified at the time of Project appraisal, the Project was designed using a framework approach for safeguards. For each of the participating states, management frameworks covering environmental and social issues were developed, consulted upon at state, district and GP levels, and publicly disclosed in April 2013. These included:⁹

- EA-EMF Report for each state, including Jharkhand;
- Social Management Framework (SMF) Report for each state and for the overall Project; and

⁸ Romantic Maidan is geo-tagged in Google Maps under the tag “Romantic Ground.” The ESR is clearly visible when this link is viewed in satellite mode: <https://goo.gl/maps/Ud9s4bqTh6R2>.

⁹ In September 2013 a revised version of the EA-EMF for UP was prepared and published on the Department website. In January 2016, a TDP for Assam was prepared by the Borrower. It was approved by the Bank and publicly disclosed on the state line department’s website in 2016.

- Tribal Development Plan (TDP) for Jharkhand.

29. **Jharkhand TDP.** The State of Jharkhand was created in 2000 out of the southern part of the State of Bihar, the culmination of a years-long statehood movement that included loss of life (pertinent to this Request for Inspection). About 28 percent of the state's total population consists of members of Scheduled Tribes.¹⁰ Four of the six Project districts have significant tribal populations, and these districts fall under the category of "Scheduled Areas"¹¹ which are subject to special constitutional and legislative provisions designed to protect tribal interests. The East Singhbhum District, where the subject of the Request is located, lies in a Scheduled Area, under the Fifth Schedule of the Constitution of India, with the Santhal tribe the predominant tribal community.

30. The tribal communities in Jharkhand affected by the Project are considered Indigenous Peoples under OP 4.10. Accordingly, during Project preparation a TDP was prepared for the Jharkhand portion of the Project. Consultations on the draft TDP were held in February 2013 in 60 habitations spread over 30 GPs in five districts, in addition to consultations with state, district and block officials. The TDP was disclosed on the websites of the Ministry of Drinking Water and Sanitation and the DWSD and submitted to the Bank in March 2013. A Hindi translation of the Executive Summary was disclosed on the DWSD website. It includes provisions intended to ensure that tribal settlements are given particular consideration in the targeting of Project benefits, and that informed consultations leading to the identification of demand-driven schemes in tribal areas take place in culturally appropriate ways.

31. As described in the TDP, institutional arrangements for local decision-making in Scheduled Areas are governed by a number of legal enactments. To address the omission of Scheduled Areas from the 73rd Constitutional Amendment (1993), which gave constitutional identity and decentralized responsibilities to the Panchayati Raj Institutions, the Panchayats (Extension to Scheduled Areas) Act, or PESA, was enacted in 1996. Following the creation of the State of Jharkhand, the Jharkhand Panchayat Raj Act was passed in 2001. Under these Acts, in tribal areas the relevant units of governance include the formally constituted GP and development projects affecting habitations are to be discussed and approved at the *gram sabha* (community assembly) of the concerned habitation(s).

32. Subsequent to the finalization of the TDP, and to provide more detail on its operationalization, the SPMU prepared a Tribal Development Implementation Plan (TDIP), involving extensive consultations of tribal experts, academics and tribal representatives. Its finalization was delayed due to the absence of a Tribal Development Specialist in the SPMU for close to two years. The Plan, which was approved in August 2018, is at a state-wide level for the state of Jharkhand rather than scheme-specific and is providing additional details and guidance on how schemes in tribal areas, including schemes involving both tribal and non-tribal communities,

¹⁰ To protect the interests of the tribal population, specific schedules were added to the Constitution of India in 1949 under its article 244 (2). The term "Scheduled Tribes" refers to the protection provided to tribal populations under these schedules, which concern specific areas. In Jharkhand, 15 districts out of 24 are listed in the "Fifth Schedule."

¹¹ "Scheduled Areas" refer to officially notified areas marked by significant presence of tribal population, geographic compactness as well as social and economic backwardness.

should be selected, designed and governed. It will also guide the implementation phase, including the involvement of tribal development specialists to fully engage the communities.

33. **Disclosure.** In Jharkhand, the EA-EMF, the SMF, the TDP, and their executive summaries in English were disclosed prior to Appraisal on a website of the State DWSD, as well as at the World Bank's InfoShop. The website of the DWSD experienced a security breach around the end of 2015, after which the website was taken offline and DWSD decided not to renew the contract with the website hosting company. The Bank has requested the SPMU to republish the documents on the new DWSD website. According to the Appraisal-stage Integrated Safeguard Data Sheet, summaries of the EA-EMF, SMF and TDP were translated into local languages and disclosed. In the course of preparing this Management Response, the Bank confirmed the disclosure of the EA/EMF in Bihar and the EA/EMF/SMF in UP but was not able to confirm disclosure of the analogous documents in other states.

34. **Consultations at the National and Regional Level.** Consultations on the EA-EMF, the SMF and the TDP in Jharkhand were conducted in Hindi, which is widely spoken in the state. A Hindi version of the EA-EMF executive summary was circulated to *panchayat* (elected village council) members, self-help groups and line department staff in advance of regional and national consultation workshops, which were held respectively in Khunti, Garhwa, Jamshedpur and Dumka on May 6, 8, 10 and 12, 2013 and in Ranchi on June 26, 2013.

35. **Consultations at the Local Level.** As discussed above, for the State of Jharkhand, consultations on the draft TDP were held in February 2013 in 60 habitations spread over 30 GPs in five districts in addition to consultations with state, district and block officials. The TDP was adopted in March 2013 and publicly disclosed in April 2013. It includes provisions to ensure that tribe-specific practices are adequately taken into consideration in the Project, and that informed consultations regarding schemes affecting tribal populations take place in culturally appropriate ways.

IV. MANAGEMENT'S RESPONSE

36. The Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1.

37. Management has carefully reviewed the claims that were raised in the Request, which are consistent with grievances expressed in a separate email communication to the Bank's task team leader in October 2018, which is when the Bank first became aware of the opposition of some residents of Purani Basti to the ESR. In October and December 2018, the Bank team¹² met with the Requesters and the community to better understand their concerns and discuss ways to address them.

38. ***Based on its own review and site visits, Management has concluded that there have been shortcomings with regard to compliance with Bank safeguard policy requirements in the implementation of the Project component involving construction of the ESR in the vicinity of Purani Basti.*** These shortcomings pertain to weaknesses in design and supervision, the conduct and documentation of consultations, the disclosure of key scheme-specific documents, non-objection for the initiation of works ahead of an approved EMP, and failure to apply OP 4.11.

39. ***Management acknowledges these shortcomings in Project implementation support and is working closely with the Borrower, state and district authorities to help address the issues.*** In the sections that follow, Management would like to clarify specific issues raised in the Request and the proposed way forward. Actions to address concerns raised in the Request are presented in paragraph 64.

Community Concerns about Expansion of the City Limits of Jamshedpur

40. ***Management understands the Requesters' concerns regarding urban expansion and the perceived threat of tribal villages losing certain legal protections afforded to them as Scheduled Areas by being integrated into the city.*** Purani Basti is located on the fringes of Jamshedpur city, the largest urban center of the State of Jharkhand and India's 36th-largest urban agglomeration. Management understands that the Government is considering the expansion of city limits for purposes of regional planning and integration. However, there is no link between the mentioned draft master plan to expand the Jamshedpur urban area and this Project, which aims to provide water to rural communities, nor was it mentioned during consultations that took place for Project preparation. This issue is beyond the scope of the Project.

Selection of ESR Site and Community Consultations

41. ***Management notes that while there is evidence of strong demand for the water supply scheme in South Sarjamda GP and in other GPs served by the scheme, it is also clear that the scheme is not universally supported and there is no evidence that a gram sabha was held in the***

¹² A Bank Team consisting of the Lead Social Development Specialist, Senior Communications Officer, and Social Development Specialist visited Jamshedpur and Purani Basti on October 15, 2018. Another mission composed of the Project Co-Task Team Leader, Lead Social Development Specialist, Senior Communications Officer, Senior Environmental Specialist and Social Development Specialist visited Jamshedpur and Purani Basti on December 23, 2018.

South Sarjamda GP to secure the community's consent to site the ESR on government land at Purani Basti. Management notes that while DPMU officials became aware of the objections of some Purani Basti residents to the siting of the ESR in August 2015, and attempted to address these objections through various subsequent consultations (including through a broad-based meeting held on May 1, 2016, called an *aam sabha*, or general assembly open to all, which is not the statutory *gram sabha*) with people living in the vicinity of the service area of the ESR, it is not clear whether the residents of Purani Basti who objected to the siting of the ESR participated in these meetings. No formal written complaint related to this ESR was filed, either directly or through the existing grievance redressal systems, although the contact details for questions or complaints related to the scheme were published in the leaflets and brochures which, the DPMU maintains, were distributed in 2016 during the ground-breaking ceremony, during consultations and during the MVWSC training in August 2017. Despite the efforts of project and district officials, it is evident that significant disagreement persists between different members of the community. Most of the households in the South Sarjamda GP covered under the scheme have already paid their community contribution and are connected (680 households out of 886, or 77 percent). At the same time, some residents of Purani Basti continue to object to the presence of the ESR.

42. Management was not aware of any written protest against the siting of the ESR before the email to the Bank of October 2018. Management became aware of two letters from 2015 in October and December 2018, respectively: (i) a letter dated August 17, 2015, from the contractor to the Executive Engineer (EE) referred to people in Purani Basti objecting to the ESR out of concern that it would reduce the area of the football playing area (no other points of objection were mentioned in this letter); and (ii) a letter dated October 31, 2015, from the EE to the Sub-Division Officer, Jamshedpur, indicated that authorities were aware of resistance to the ESR at the scheme site and mentioned Sarjamda along with other locations; it stated that despite multiple talks led by the Circle Officer, works had not started due to opposition by those who have “illegally occupied /encroached and are causing hindrances.” The letter requested that consultation meetings be organized with the presence of the EE, Circle Officer, Jamshedpur and that the local police officers participate. Management has not been able to ascertain whether there was police presence at any of these meetings. These letters were not shared with the Bank until December 2018.

43. Subsequently, three consultations concerning the Chhotagovindpur MVS took place, on April 4 and 17, and May 1, 2016, with details as follows:

- *April 4, 2016:* Meeting in South Sarjamda Panchayat building, which consisted of a training/orientation program for members of the VWSCs and *jal sahiyas*. The minutes were signed by 38 participants including members of the VWSCs, the treasurers and the *jal sahiyas*.
- *April 17, 2016:* Meeting in North Sarjamda Panchayat building with representatives of all three GPs of the Sarjamda revenue village (North, Middle and South Sarjamda). About 100 people participated. The meeting was focused on addressing the concerns about the Project and the opposition to the construction of the ESR. The minutes of this meeting were brief and stated only the purpose and designations of officials present; it was not possible to determine whether anyone from Purani Basti participated in this meeting.

- *May 1, 2016:* A meeting called an *aam sabha* (general assembly open to all; not the statutory *gram sabha*) chaired by the *gram pradhan* was held on the Janta Maidan of North Sarjamda Panchayat to discuss the opposition to the construction of ESR on the Romantic Maidan of South Sarjamda. The meeting lasted for nearly 5 hours and was captured in at least 10 video clips and many photos. As evidenced from the minutes, video clips and photographs, 197 persons (including many women) participated in this meeting. In order to reach out to the small section of the audience who were more conversant in Bengali, salient features and other aspects were explained in Bengali as well.

44. Management only became aware of these meetings very recently. It has reviewed the video clips and other materials pertaining to the *aam sabha* that were made available. While it seems that this meeting was a major and open forum for people to voice concerns and raise questions about the MVS, none of the video clips reviewed by Management included discussion of the location of the ESR and it is not clear whether the Requesters or anyone from Purani Basti participated in this meeting.

45. Key points raised at the May 1, 2016 meeting and recorded in the video clips include the following:

- A description of the scheme and its operation:
 - The scheme is designed to supply 135 liters of drinking water per capita, per day every day.
 - Water for this scheme will come from Subarnarekha River, will be treated and then supplied to people; no groundwater will be extracted in the villages.
 - Communities are to provide a contribution of 1 percent of the overall project cost. Scheduled Tribe/Caste households will pay INR 225/- towards a house connection and later a monthly tariff will be applicable as and when decided.
- Participants in the *aam sabha* also raised the following issues:
 - This is a water-scarce area and women spend much time fetching water from different sources and waiting for water tankers; hence, the piped water supply scheme will benefit all those in Parsudih, Sarjamda and other areas covered by the scheme.
 - Following panchayat elections in 2010, PRI representatives demanded that roads, water supply, education and health facilities in the rural panchayats around Jamshedpur be brought up to par with city neighborhoods being serviced by the Tata Group companies. The proposed scheme responds to this demand.
 - Tap water will dry up existing ponds and it will not be possible to undertake cultural and religious rituals (such as rituals for the deceased) that need pond water.

- If there is water supply in the area similar to the Tata areas and also if a health center comes it will become easier to include this area in the city municipality. This would mean any construction will require approvals from municipal authorities.
- Such schemes should be discussed and approved by the *gram sabha*, and not by an *aam sabha*, and that traditional leaders have not been respected; authorities should show respect in some manner (for example, construct water tanks with names of traditional leaders).

46. Despite the efforts made in the meetings, as evident from the above, significant disagreement between some community groups persisted and some members of the community continued to have objections to the siting of the ESR, while others provided their support. Given these differences and the weaknesses in documentation of the consultation process, Management is not able to confirm unambiguously that broad community support, as required by OP 4.10, was achieved.

Concerns about Community Economic Impacts of the Scheme

47. Participation in the scheme is entirely on a voluntary basis and access to existing local water sources will not be affected by the Project, nor will the Project introduce a requirement to pay for use of these sources. Moreover, it is not expected that the Project will impact or diminish the locally available water sources that the community currently uses free of charge. Local water sources will not be affected by the Project in flow, quality or quantity. The surface-water-fed and treated piped water supply will be made available through a metered scheme to ensure that only those who choose to use the piped water will be charged. Community members can choose to benefit from the additional supply of clean piped water that the Project will make available or decide not to opt in. The Chhotagovindpur MVS will provide a 24/7 delivery service. For those households that opt to receive piped water from the scheme, there is a one-time nominal community contribution which is discounted for members of Scheduled Tribe/Scheduled Caste groups as noted in paragraph 9 above. The suggested minimum monthly tariff of INR 62/- per household in Jharkhand would apply when the scheme becomes operational. This amount is less than a third of the current average monthly cost of electricity in the community.¹³

Shortcomings in the Preparation and Supervision of the EMP

48. **EA-EMF.** The EA-EMF for Jharkhand sets forth procedures and criteria for screening schemes and for addressing potential environmental impacts identified through that screening. According to the EMF, the initial screening involves public consultation with the relevant community, a preliminary identification of environmental issues and completion of an Environmental Data Sheet (EDS). Based on the EDS, the scheme in question is classified as either Category 1 or Category 2 depending on the significance of the potential environmental impacts. For Category 1 schemes, no separate environmental appraisal is required. For Category 2 schemes, given their potentially more significant environmental implications (albeit within the context of Category B projects), a detailed environmental appraisal is required, including an evaluation of environmental and public health impacts, risk assessment and the design of mitigation measures.

¹³ During consultations with the community on December 23, 2018, interlocutors indicated current monthly charges for electricity of around INR 200-250.

This environmental appraisal is to be prepared by the district level environmental expert using the EDS and a scheme screening tool to determine the scheme-specific environmental category and therefore the level of appraisal required. Tools to carry out the scheme-specific environmental appraisal are set out in Annexures 18 and 19 of the EA-EMF.¹⁴ The results are consolidated in an EMP, also prepared by the district level environmental expert, as per the provisions of the Jharkhand EA-EMF.¹⁵

49. ***EMP for the ESR.*** The Chhotagovindpur MVS was classified as a Category 2 scheme, requiring a detailed environmental appraisal to be included in and informing an EMP. Management notes that under the EMF, the responsibility to develop the EMP rests with the district government. In the case of MVSs, the practice under the Project has been to delegate the preparation of the EMP to the contractor, while approval remains with the government authorities. As per agreed implementation procedures, however, a preliminary EMP based on the preliminary design of the scheme should have been attached to the DPR to inform the bidding process, in addition to the EDS. This was not done, and the Bank missed an opportunity to ensure that it was developed upfront before providing its “no objection” as part of the procurement prior review process of the DBOT contract.

50. A single EMP for the Chhotagovindpur and Bagbera schemes was prepared by the contractor. This EMP was originally submitted for government approval in July 2015 and approved by district authorities in 2017. The Project Agreement between the Bank and the Government of Jharkhand requires that scheme-specific EMPs be submitted to the Bank for prior review and approval. In this case, this requirement was not met and Management acknowledges that the Bank did not follow up. This EMP is currently being updated to address identified weaknesses.

51. ***Management acknowledges that the scheme-specific EMP should have been finalized prior to the start of the works in October 2016.*** The contractor prepared the scheme-specific EMP and submitted a draft to the DPMU for approval on July 23, 2015. However, the EMP was not finalized before the start of the civil works. The November 2015 and July-August 2016 Bank missions recommended preparation of an updated EMP to consider various environmental management issues for the two MVSs. During the February 2017 mission, the Bank team requested that the draft EMP be shared with the Bank, so that the Bank could review it and provide comments. On March 3, 2017, the DPMU requested the contractor to revise the EMP to address the Bank’s comments.¹⁶ A revised EMP was submitted on May 26, 2017. The Bank team reviewed the updated version in June 2017.

52. The version of the EMP that was submitted to the District Executive Engineer on August 2, 2017, incorporating comments from the SPMU and DWSD, was approved by the district

¹⁴ In May 2015, the Bank team prepared a guideline document entitled “Environmental Management: Procedures and Tools,” to respond to counterparts’ request for further guidance to facilitate environmental safeguard implementation and monitoring. The Bank team promoted its use and referred to it in subsequent missions.

¹⁵ Pages 186-192 and Table 29, pages 92 and 93.

¹⁶ Comments provided on the EMP focus on debris/excavated material management and disposal, topsoil recovery, proper sanitation and management of sewage and sullage; security on worksite including dug/cut slope protection, full site restoration at end of construction, sludge management and disposal arrangements during O&M phase, detailed cost estimates, assignment of responsibilities and EMP monitoring.

authorities on October 5, 2017. This information was not shared with the Bank team, which provided additional comments to the SPMU during the November 2017 technical visit to Jharkhand.

53. Following the November 2018 mission, the Bank team requested the counterpart to require the contractor to: (i) update the EMP; (ii) bring it into compliance with the EA-EMF; (iii) separate the combined EMP into one EMP each for the Chhotagovindpur MVS and the Bagbera MVS; and (iv) reflect relevant issues raised in the Request in the updated EMP. The contractor submitted separated EMPs for the Chhotagovindpur MVS and the Bagbera MVS to the district authorities, who conveyed them for the Bank's review on December 13, 2018. These documents did not integrate most of the Bank comments. The contractor has committed to incorporating the Bank's comments and submitting the updated and separate EMPs to the district authorities, who will convey the documents for the Bank's review by end-February 2019. In addition, the Bank team required that monitoring and reporting of EMP implementation be strengthened and advised the contractor, SPMU and DPMU of the need to undertake consultations on issues that can still be managed and/or mitigated satisfactorily during the update of the EMP, to document such consultations in the EMP and to publicly disclose the approved and updated EMP in all GPs and habitations concerned, as well as at the DPMU and contractor's offices.

Impacts on Shared Community Resources and Physical Cultural Resources

54. ***Management acknowledges that OP 4.11 was not applied to the Project.*** According to the Requesters, the Romantic Maidan was a site of a memorial, composed of boulders, to three men who lost their lives in the movement to establish a separate state for Jharkhand. The Requesters say that these boulders were destroyed when the contractor started works in October 2016 and that the contractor installed three busts in their place to commemorate the men. However, during the Bank team's visit on December 23, 2018, the contractor reported that the plot where the ESR was built was bare, containing no boulders. The contractor said that the local community at Purani Basti requested that the contractor finance the busts and the contractor agreed in the interest of good relations with the community. The contractor was not able to provide evidence in support of these assertions. Community members stressed that erecting busts or statues or other structures goes against their cultural traditions, which use stones, trees and other natural phenomena as markers of worship and reverence. They also said that the three statues at the site had been erected by a political party when construction commenced, without consultation with the community. There is no evidence that supports this assertion.

55. Accounts also differ with respect to the reported use of the Romantic Maidan for tribal festivals. According to the Requesters, the annual Gote Pooja is held here and involves games with cattle. A larger festival, Jaher Dangri, is celebrated every five years (the next is due in January 2019) and involves hosting large numbers of relatives and friends from other far-off communities. However, MVWSC members maintained that such events take place at the adjacent Jaher Maidan or at another maidan in lower Purani Basti. The Romantic Maidan was reportedly used for weekly *haats* (markets) in the distant past, but these also had shifted long ago to another location at Parsudih. Further, they indicated that there was a large crater at the ESR site prior to construction, and that currently the field is used only for playing football and, in parts, for open defecation.

56. Based on the information gathered and the consultations at site in December 2018, Management is of the view that there is sufficient land available at the Romantic Maidan, even considering the presence of the ESR, to allow for the cultural uses described in the Request for Inspection. The plot occupied by the Project represents a small portion of the total area of the field (13 percent), and the area not occupied by the Project (87 percent) will remain open and accessible to the community.

Concerns about Potential Impacts of Water Supply Scheme

57. Community access to existing local water sources will not be affected by the Project, nor will the Project introduce a requirement to pay for use of these sources. Moreover, it is not expected that the Project will impact or diminish the locally available water sources in flow, quality or quantity. Community members may continue to use those sources free of charge if they so desire. The surface-water-fed and treated piped water supply will be made available through a metered scheme to ensure that only those who choose to use the piped water will be charged. However, free groundwater sources like the ones currently used by the community will continue to be unsafe as there is widespread contamination of groundwater in the area, as documented in the EA-EMF (see below). Community members can choose to benefit from the additional supply of clean piped water that the Project will make available or decide not to opt in. Management recognizes that there is a need for additional information about the Project and its benefits to be provided to the beneficiary population. The SPMU and DPMU are launching a new round of consultations in all GPs of the MVSs to provide scheme information, clarify these aspects, and respond to people's queries.

Concerns about the Project's Potential Environmental Impacts

58. ***Alleged impacts on local hydrology and water supply.*** No impact from the river water abstraction on the groundwater levels in Purani Basti is expected. Groundwater impacts are usually limited to sources located close to the river and where the volume abstracted represents a significant share of the water flow. The water intake of the Chhotagovindpur MVS is located on the Subarnarekha River downstream from the confluence with the Kharkai river at a location called Luwabasa, 7.8 kilometers from the Sarjamda ESR. As per the scheme design, the maximum amount of water withdrawn, 43 megaliters per day, is negligible compared to the total river flow.

59. ***Concerns about sludge disposal.*** The only infrastructure in the MVS which generates sludge is the WTP of the scheme located in HUDCO park in Jamshedpur which is not associated with this request. That sludge will be handled appropriately and will have no direct impact on the Purani Basti community.

60. The raw water intake is located at a point where the water is least expected to contain heavy metals. Management has reviewed the water analysis performed in the last 12 months at the water intake of the WTP, which shows very low levels of heavy metals in the raw water, almost at the level of Indian Standard IS 10500 2012 on Drinking Water. The WTP is designed to be able to remove heavy metals and other contaminants to ensure that the drinking water is delivered according to standard. The specific approach to sludge management and disposal will be in place by the time the WTP begins operation, planned for February 2019. It will be detailed in the updated EMP and will be supervised by the DWSD of the State of Jharkhand. Based on the low levels of

heavy metal contaminants, the sludge from the WTP should not be considered as a toxic waste. Management will request district authorities to advise the contractor on an appropriate discharge site for the water treatment sludge and will request the DPMU to share the water testing results with the community.

61. ***While water quality at the WTP intake point is within acceptable limits, groundwater in many locations in Jharkhand has high levels of arsenic, iron, fluoride and nitrates that are detrimental to human health.*** The TDP mentions that poor groundwater quality, including fluoride and iron contamination, is one of the major concerns of the community. The EA-EMF refers to iron and nitrate contamination as predominant in the groundwater in the Jamshedpur area, and notes also that isolated cases of radioactivity exist.

Interactions with the Requesters

62. The Bank team took the opportunity of a visit to a nearby habitation to visit Sarjamda on October 15, 2018 and met with the complainant who had sent the email to the task team leader (the Request for Inspection refers to this meeting). The complainant invited the team back to participate in a larger meeting and this was organized for December 23, 2018, when the Bank team met with the complainant and some 75 members of Purani Basti and other communities. At this meeting, community representatives said that the *mukhiya* of South Sarjamda GP threatened to involve the police if protests did not desist. However, the community did not cite any instance of actual police coercion. Management has made it clear that the World Bank does not tolerate coercion and retaliation and will continue to work with the concerned governments to ensure that this risk does not materialize.

63. With regard to the Requesters' demand that construction works on the ESR scheme be immediately stopped and the scheme removed altogether, Management notes that this demand is not practical (as the ESR is virtually completed and operational trial runs are ongoing). Moreover, there is clearly a strong demand for piped water in the associated communities as evidenced by the high level of paid-in community contributions from beneficiary households.

Actions Going Forward

64. Based on discussions with the community, Management will initiate the following actions, all of which have been discussed and agreed with the Borrower and the state and district counterparts:

Actions specific to the Second Request for inspection:

In direct response to community concerns:

- By end-February 2019: Management will support the Government of Jharkhand to consult with concerned members of the Purani Basti, South Sarjamda community on the ESR to better understand their concerns and to identify and agree on possible measures to address Project-related impacts. Such measures may include support for the following:
 - ensuring that a survey is carried out to identify households in service areas not within reach of a distribution line, and extending the scheme to provide service to households that wish to join it;

- potentially developing the Romantic Maidan as culturally appropriate, and in consultation with the affected communities including the Requesters;
- undertaking a discussion with the community and its traditional tribal leaders as to what constitutes an appropriate memorial and exploring re-installation of boulders for the three martyrs or ritually shifting the martyrs' boulders to another sacred site;
- providing other culturally appropriate benefits to the community.
- By end-February 2019: Management will support the State Project Management Unit (SPMU) to review and update existing Information, Education and Communication (IEC) materials (including basic information about the Project and its expected benefits as well as about water, sanitation and hygiene in general) to consider existing community concerns, and to finalize preparation of the IEC materials in Santhali and Ho, the most widely spoken tribal languages in this area.
- By end-March 2019: Management will work closely with the SPMU and DPMU to ensure that appropriate consultations on the updated EMP and disclosure are carried out. The update of the EMP for the Chhotagovindpur MVS will reflect the feedback from the above-cited detailed consultations with the Purani Basti community.¹⁷
- By end-March 2019, Management will complete a review of the processes followed to document community "no objection" to the siting of significant infrastructure (WTPs, ESRs) associated with the two MVSs in Jharkhand.

To address overall project shortcomings:

- By end-March 2019: Management will support the SPMU to disclose the current design of the water schemes and the plan to extend the distribution network to allow coverage of households interested in a water connection in all 21 GPs of the service area.
- By end-March 2019: Management will hire experts in anthropology and cultural heritage with local experience to assist the Bank team in overseeing the implementation of the Tribal Development Plan (TDP) and Tribal Development Implementation Plan (TDIP) and the social audit that the SPMU and DPMU will be carrying out.
- By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to hire an agency to support consultation and regular training on environmental and social issues and the TDP

xxiv. In addition, the following actions included in the Management Response to the First Request for Inspection are also relevant to the remedial actions to address the concerns raised in the Second Request:¹⁸

¹⁷ The action plan contained in the Management Response to the First Request for Inspection had a similar requirement concerning the Bagbera EMP, which originally covered both MVSs. The EMP has since been split into two separate MVS-specific EMPs.

¹⁸ Several target dates for those actions had to be adjusted to reflect slower than anticipated progress in several areas. For example, to date, implementation stage consultations have taken place in 25 of the 38 GPs; the review of the draft updated EMPs is ongoing and the Bank has provided comments that are being currently reflected by SPMU and DPMU; the decision to hand-deliver translated documents to the Mukhiya of each GP requires additional time to complete the action.

In direct response to community concerns:

- By end-February 2019: Management will support the Government of Jharkhand to undertake implementation stage consultations in all GPs covered by the Bagbera and Chhotagovindpur MVSs to update community members on implementation progress. This will allow further scheme information to be provided; clarify aspects related to environmental and tribal development management; as well as provide information on the start of service delivery, and financial aspects related to community contribution and water tariffs, in addition to responding to people's queries.¹⁹
- By end-February 2019: Management will complete a review of the revised draft updated EMPs for the Chhotagovindpur and Bagbera MVSs, which the DPMU has committed to submit to the Bank for review by end-January 2019.
- By end-March 2019: Management will request the DPMU to share the results of the water analysis at the water intake with the community and make them publicly available as part of the EMP.

To address overall project shortcomings:

- By end-February 2019: Management will ensure that executive summaries of safeguard documents are translated and disclosed in Hindi, the predominantly read language in the Project areas, on the relevant department website, at the head office of each GP and at the offices of the contractor.
- By end-January 2019: Management will follow up with the SPMU and DPMU to ensure completion of the review of the scope of works and training of the 400 Community Organizers (CO) that have been placed in all five districts of Jharkhand since May 2018, to give them a greater role in disseminating information about the Project, relaying community concerns, and in environmental and social monitoring. This review will also cover Project and site-level GRMs and identify steps to strengthen them. (This action has been completed).
- By end-February 2019: Management and PMUs will complete the ongoing comprehensive review of safeguard compliance of the Category 2 schemes supported by the Project, which includes all of the MVSs in addition to some SVSs and will prepare an action plan for time-bound implementation of any remedial measures that may be required. Priority is being given to completing the reviews of the safeguard documentation for the Chhotagovindpur and Bagbera MVSs, including the EMPs, and any remedial action pertaining to these MVSs will need to be addressed before the MVS starts operation.
- By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to ensure adequate staffing and staff capacity strengthening for appropriate monitoring of EMP implementation and application of safeguards instruments.²⁰

²⁰ The recruitment process has encountered delays and is still ongoing.

- By end-March 2019: completion of Project restructuring, which will include the application of OP 4.11 among other aspects.²¹

²¹ The restructuring of the project is likely to require more time than originally anticipated.

India: Rural Water Supply and Sanitation Project for Low Income States (P132173)
Second Request for Inspection (RQ18/07)

Annex 1. Claims and Responses

No.	Claim	Response
1.	<p>We are the <i>Adivasi</i> (Indigenous or original inhabitants) community of REDACTED the state of Jharkhand, India. Our collective cultural resources, livelihood, and autonomy have been affected by the International Development Association supported IN Rural Water Supply and Sanitation Project for Low Income States (“RWSS-LIS”) (World Bank Project P132173), specifically its sub-project, the REDACTED). The aggrieved community comprises of people belonging to <i>Santhal</i> and <i>Ho</i> REDACTED tribes. We are hereby filing a Request for Inspection to the Inspection Panel through representatives from our traditional governance system. Please find enclosed a list of names and signatures of community members that have come together to file the complaint (in confidential Annexure A). We fear there may be reprisals REDACTED for complaining against the REDACTED Scheme. Therefore, we request the Inspection Panel to keep the names and identities of the complainants confidential.</p> <p>REDACTED is directly affected by the REDACTED. An elevated storage reservoir (ESR) is being constructed on our common community land in the village. This land has profound historical and cultural significance for the community, and the ESR will disrupt our way of life and customs. The REDACTED Scheme also threatens to make our already poverty-stricken communities more vulnerable by charging us for drinking water.</p> <p>This letter sets out violations of the World Bank’s social and environmental safeguard policies in the implementation of the REDACTED Scheme. It documents that the environmental assessment done was inadequate and did not include a proper assessment of impacts on physical-cultural resources. It also records failures to inform and consult with the affected community about the Scheme, including its design and planning.</p> <p>This consultation failure violates not only World Bank policies, but also Indian law. As an Indigenous-majority area, REDACTED enjoys special protections under the Constitution of India and domestic legislation, which requires any development scheme, welfare plan or decision regarding common community resources be taken by a relevant <i>Gram Sabha</i>. A <i>Gram Sabha</i> is a general assembly of all the people of a village, who have attained the age of 18</p>	<p>Local Context of the ESR site. For purposes of this Management Response, it is important to note that the World Bank team received an email complaint on October 10, 2018, the content of which was similar to that of this Request for Inspection. The Bank team took the opportunity of a visit to a nearby habitation to visit Sarjamda on October 15, 2018, to meet with the complainant in this case. The complainant later addressed an email to the World Bank expressing dissatisfaction with the lack of advance notice prior to the meeting (the team followed advice from security staff in this regard). In light of this, the Bank team made a second visit to the site on December 23, 2018, to meet with the complainant and some 75 members of Purani Basti and other communities invited by the Complainant.</p> <p>Based on these facts, for purposes of responding to this Second Request for Inspection, Management has assumed that the request pertains to the ESR in the South Sarjamda GP, which is part of the Chhotagovindpur MVS.</p> <p>The ESR is one of five ESRs of the Chhotagovindpur MVS. It is located on government land (recorded in the official revenue records as <i>anabad</i> (uninhabited) Bihar (Jharkhand since its creation in 2000) land) in the South Sarjamda GP, which is one of the three GPs within the Sarjamda revenue village. A revenue village is a small administrative region in India with defined borders. The GPs, which are the rural local governing bodies, have at least 5,000 inhabitants each. There are no administrative maps below the revenue village level, and therefore no recorded limits between usage and influence areas of each habitation.</p> <p>According to data collected in a survey under the Project, in 2017-18, there were 7,500 people in the in South Sarjamda GP, of which 45 percent are classified as belonging to Scheduled Tribes, about 16 percent as Scheduled Castes and 39 percent as General Population. Within South Sarjamda, there are eight habitations, including Purani Basti, the location of the ESR (see Figure 2 in the main text).²² According to the DPMU, there are 375 households in Purani Basti, which is equivalent to a population of 2,025.</p> <p>Project authorities indicate that no formal written complaint related to this ESR was filed, either directly with them or through the existing grievance redressal systems, although the contact details of the SPMU and information on submission and redressal of complaints</p>

²² The others are Chhola Goda, Janegoda, Lupung Tola, Doka Tola, Shankarpur, Nidhir Tola and Jaher Tola.

No.	Claim	Response
	<p>years, and are registered in the electoral roll relating to a village. A <i>Gram Sabha</i> resolution is a majority vote in favour of an issue. In this case, the project did not receive <i>Gram Sabha</i> consent. REDACTED threatened community members of dire consequences when they tried to protest REDACTED, outside of REDACTED office against the forceful illegal construction of the ESR on their common property. The community fears the REDACTED Scheme is part of a larger plan to expand the boundaries of the adjacent city, REDACTED, which risks taking away the special legal protections afforded to the community as a rural Indigenous village in India.</p> <p>We request the Inspection Panel to immediately conduct an investigation that affirms the violations of Bank policy described in this letter. The community trusts that the Panel process will result in the Bank taking steps to remedy the issues raised in this Request. In particular, the community requests the World Bank to:</p>	<p>related to the scheme were published in the leaflets and brochures which, the DPMU maintains, were distributed in 2016 during the groundbreaking ceremony, during consultations and during the MVWSC training in August 2017.</p> <p>The ESR is nearly completed and operational trial runs of the MVS began in the first week of December and will continue through the first week of February 2019. The scheme is expected to start operation by the end of February 2019. With respect to the allegation of threats of dire consequences, while the details have been removed through the process of redaction, Management notes that in the Bank team's consultations with aggrieved Purani Basti community members in October and December 2018, community members made no reference to actual coercion. During the team's December 23, 2018 meeting with the community, community representatives said that the <i>mukhiya</i> of South Sarjamda GP threatened to involve the police if protests did not desist. However, the community did not cite any instance of actual police coercion.</p> <p>The land on which the ESR has been constructed is government land.</p> <p>Concerning the possible incorporation of Purani Basti into neighboring Jamshedpur, please see Item 5.</p>
	<p>Impacts of the REDACTED Scheme on the community</p>	
2.	<p><i>Harms caused to community's physical cultural resources and traditions.</i> Construction of the ESR threatens the continuation of essential cultural practices of the Indigenous community. The state authorities are constructing the ESR on community land, locally called REDACTED. The popular local name is REDACTED. The REDACTED is a common cultural resource of the residents of REDACTED. Every year, after Diwali, the community has REDACTED celebrations.</p> <p>One of the community customs associated with REDACTED used to happen at REDACTED. This is an old community tradition where villagers keep an egg in the middle of the ground, and all the cattle in the village are let loose. The person whose cow breaks the egg first is the winner. The community can no longer practice this tradition associated with REDACTED because common community land was grabbed for the construction of an ESR under the REDACTED Scheme.</p> <p>Furthermore, every five years, the community has a sacrificial ceremony called REDACTED, which is followed by a traditional feast. Villagers invite relatives from far and wide and everyone partakes in a mass community feast at the ground. With the ESR coming up on the ground, there is no space to hold</p>	<p>The land on which the ESR was constructed is government land registered as "uninhabited Jharkhand land" in the land registry, as evidenced in the letter of authentication issued by the Circle Officer on May 26th, 2012. As a land "No Objection Certificate" for the Sarjamda ESR could not be found, District authorities requested the Circle Officer to issue one, which happened on December 21, 2018.</p> <p>According to the contractor, the land where the ESR was built was undeveloped (bare) before the start of construction. The field in which the ESR is located is called "Romantic Maidan" (a "maidan" is an open ground or field). Efforts were made to confirm the use of this site earlier through historical satellite images and also through interactions with community members at Purani Basti and with MVWSC members for the Chhotagovindpur scheme. Historical satellite images confirm that no visible artefact or structure was erected on the 35m x 35m plot used for the ESR construction.</p> <p>The total area of the government land, as registered, is 2.23 acres (9,024 m²), of which the ESR will use less than 14 percent (35m x 35m). The ESR is in the north-eastern corner of the plot adjacent to existing government buildings that include a health center. Satellite images and recent visits to the site confirm that the rest of the field (outside of the area of the ESR) is open and accessible to</p>

No.	Claim	Response
	this customary practice anymore.	<p>the public.</p> <p>During the Bank team's second visit to the site on December 23, 2018, interactions with members of the wider community yielded contradictory evidence on the usage of the Romantic Maidan for worship or cultural events. According to the Requesters, the annual Gote Pooja is held here and involves games with cattle. A larger festival, Jaher Dangri, is celebrated every five years (the next is due in January 2019) and involves hosting large numbers of relatives and friends from other far-off communities. However, MVWSC members, in separate interactions with the Bank team on December 23, 2018, maintained that such events take place at the adjacent Jaher Maidan or at another maidan in lower Purani Basti. The Romantic Maidan was reportedly used for weekly <i>haats</i> (markets) in the distant past but these had also shifted long ago to another location at Parsudih. Further, they indicated that there was a large crater at the ESR site prior to construction. Currently the field is used only for playing football and, in parts, for open defecation.</p> <p>Based on the information gathered and the community consultations, Management is of the view that there is sufficient land at the Romantic Maidan, even taking into account the presence of the ESR, to allow for the cultural uses described in the Request for Inspection.</p>
3.	<p>During the construction of the ESR, a martyrdom site was also razed. This martyrdom site commemorated REDACTED from the community who gave their life to the struggle for statehood for Jharkhand. Boulders were placed at that site in their memory. Every year, on REDACTED, the community would observe their martyrdom day at that site. This martyrdom site was an important physical, historical and cultural resource of both the community and Jharkhand. They razed the boulders to construct the ESR. A statue with busts of the REDACTED martyrs was placed adjacent to the ESR by the project implementors. The community does not believe in having statues of community members who have died. Stones or boulders are placed in their memory instead. The community was never consulted on this issue.</p> <p>The site of the ESR REDACTED has strong bonds with the way of life, culture, traditions, and history of the Indigenous people of REDACTED. Taking the ground away from the community is an attack on its traditions, culture, and history.</p>	<p>There is no record of consultations on this issue before the start of construction. In recent consultations, accounts differ on whether or not boulders pre-dated the erection of the statues of the three men who lost their lives in the movement to establish the state of Jharkhand. During the Bank team's visit on December 23, 2018, the contractor reported that the plot where the ESR was built was bare, containing no boulders. The contractor said that the local community at Purani Basti requested that the contractor finance the busts and the contractor agreed in the interest of good relations with the community, noting that the total (INR 47,000, or less than \$700) was not a significant sum. The contractor was not able to provide evidence in support of these assertions.</p> <p>However, the Purani Basti residents with whom the Bank team met insisted that there were boulders in memory of the three men at the site of the ESR. Community members showed the Bank team the location of the alleged martyrs' memorial under the ESR pillars. They stressed that erecting busts or statues or other structures goes against their cultural traditions which use stones, trees and other natural phenomena as markers of worship and reverence. They also said that the three statues at site had been erected by a political party when construction commenced, without consultation with the Purani Basti community. These residents of Purani Basti were not able to provide evidence in support of this assertion.</p>

No.	Claim	Response
4.	<p><i>Economic impacts and impacts on community autonomy.</i></p> <p>The community is also concerned about the economic impacts of the whole water supply scheme, fearing that it will worsen already poor conditions in the region. Many of the households currently live below the poverty line. They rely on local water resources, including wells and hand-pumps, for their water needs. Until now, this water has been available free of charge. However, after the implementation of the Scheme, they will have to pay for access to water. They fear this will further impoverish the community.</p>	<p><i>Community access to existing local water sources will not be affected by the Project, nor will the Project introduce a requirement to pay for use of these sources.</i> Moreover, it is not expected that the Project will impact or diminish the locally available water sources that the community currently uses free of charge. Local water sources will not be affected by the Project in flow, quality or quantity. The surface-water-fed and treated piped water supply will be made available through a metered scheme to ensure that only those who choose to use the piped water will be charged. Community members can choose to benefit from the additional supply of clean piped water that the Project will make available or decide not to opt in. The Chhotagovindpur MVS will provide a 24/7 delivery service. For those households that opt to receive piped water from the scheme, there is a one-time community contribution which is discounted for members of Scheduled Tribes/Castes (the “community contribution” from members of Scheduled Castes and Scheduled Tribes is set at INR 225/- (US\$3) and at INR 450/- (US\$6) for all others).</p> <p>However, it should be noted that free water sources like the ones currently used by the community will continue to be unsafe as there is widespread contamination of groundwater in the area, as documented in the EA-EMF. The rationale for the Project is to supply clean and safe drinking water as an alternative to these unsafe sources.</p> <p>The Bank team is supporting the four Project states and the GoI in setting up O&M Policies for Rural Water Supply, which provide guidance on tariff setting and other technical and financial responsibilities to the GPs. The Project is among the first to support GPs to take responsibility in the management of piped water services, either through direct management by VWSC (in the case of SVSs in Jharkhand) or through delegated management to private operators through DBOT contracts for MVSs. The policy will provide guidance to GPs to ensure sustainability and affordability as they set the tariffs, while keeping GPs accountable for long-term service delivery.</p> <p>The data on payments to date of the community contribution indicate strong demand for the Project. As per data provided by the DPMU, in South Sarjamda, there were 1,637 households as per the DPR and 1,474 households as per the baseline survey completed recently. Under the current scope of work, the contractor’s obligation is to lay pipes to enable 886 households to connect as these households have paid their community contribution. Of these 886, 680 households (77 percent) are already connected. However, at the consultations with the Bank team on December 23, 2018, it emerged that the members of the Purani Basti community with whom the team met were under some critical misapprehensions (about the voluntary nature of the scheme, the expected tariff, and the continued availability of their existing groundwater sources such as wells and handpumps whose</p>

No.	Claim	Response
		water they value for ritual purity). These point to a lack of adequate information dissemination and education about the details and benefits of the scheme.
5.	<p>The community also fears the REDACTED Scheme is being used to expand the city limits of the adjacent city, REDACTED. This could alter the fundamental nature of the area, from a protected Indigenous area under the Constitution to an urban centre that would lack such protections. According to the Draft Proposal Master Plan for REDACTED Urban Agglomeration, the new proposed expansion of REDACTED. Such an expansion could have a disastrous impact on the Indigenous community of REDACTED and other surrounding villages, including impacts on their culture, access to resources, and traditional governance practices. The <i>Santhal</i> and <i>Ho</i> communities enjoy Indian Constitutional and legislative protections regarding rights over land and water resources. Expansion of city limits may dissolve those protections and further marginalise the Indigenous communities.</p> <p>The REDACTED Scheme, which has already been implemented by sidestepping traditional governance institutions, appears to be part of this expansion plan. According to the Draft Proposal Master Plan, one of the key goals of this urbanisation process is to establish an urban area with treated piped water supply. The REDACTED Scheme is, therefore, a key component in furtherance of this urbanisation process. As such, the World Bank is complicit in undermining the Constitutional rights and protections of Indigenous communities through its support of this Scheme.</p>	<p><i>Management understands the Requesters' concerns regarding urban expansion and the perceived threat of tribal villages losing certain legal protections afforded to them as Scheduled Areas by being integrated into the city.</i> However, urbanization and urban expansion in India are significant and driven by many factors and are beyond the scope of this Project. There is no link between the mentioned draft master plan to expand the Jamshedpur urban area and this Project, which aims to provide water to rural communities, nor was it mentioned during consultations that took place for Project preparation.</p> <p><i>Master plan.</i> Management understands that the Government of Jharkhand is considering the expansion of the Jamshedpur city limits for purposes of regional planning and integration. The district magistrate and deputy commissioner mentioned that a plan is in preparation but is not finalized. According to government practice, it can be expected that there will be a process of public consultations around the finalization of the master plan. In fact, in the December 23, 2018 meeting with the Bank team, the community mentioned that it had already formally registered its protests several times when the state government had asked for public feedback on a proposal to extend the limits of the city municipality.</p> <p><i>Water schemes under the Project.</i> The location of the drinking water supply schemes included in the Project are driven by defined selection criteria of water quality and quantity, focus on poor areas, and rural location. The Project is an integral part of the wider NRDWP of the GoI, the objective of which is to provide 80 percent of the rural population with piped water supply by 2022. The GoI and the Bank are financing similar piped water schemes in villages across India.</p>
6.	<p><i>Lack of information disclosure and community consultations.</i> Besides the harmful impacts of the project on its customs, and physical cultural resources, the community is also aggrieved by the lack of information disclosure and consultation for this project. Documents pertaining to the REDACTED Scheme are not available on the World Bank info-shop. The community only got access to the Detailed Project Reports, and the Preliminary Design reports for the REDACTED Scheme after the REDACTED of another impacted village, REDACTED, shared it with the REDACTED. The REDACTED got hold of these documents after going through a strenuous process under the Right to Information Act. World Bank management and the implementing authorities never consulted the REDACTED about this project. In REDACTED, a team from the REDACTED came to the</p>	<p><i>Various efforts at consultations and information-sharing were undertaken in the course of Project preparation and implementation. Nonetheless, Management acknowledges that these efforts should have been more comprehensive and undertaken earlier on in preparing the scheme in question. The statutory gram sabha was not carried out to obtain community consent to the siting of the ESR in Purani Basti.</i></p> <p>Information disclosure about the scheme took place through: (i) the <i>jal sahiyas</i> who have been active since 2012 and who are responsible for raising awareness about the Project (eventually collecting community contributions, etc.); (ii) distribution of brochures and FAQs leaflets and wall writings; and (iii) monthly MVWSC meetings since the formation of the MVWSC in January 2018. Details follow:</p>

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	<p>site in the village, for inspection. When members of the community asked them questions, the inspection team told them they were doing a soil examination. The team assured the community no construction would happen in the village without Gram Sabha consent.</p> <p>Another REDACTED team visited the site REDACTED. This team came with machinery for the construction of the ESR. The community opposed any proposed construction and held protests. The administration again gave the community an assurance that no construction activity would take place without a <i>Gram Sabha</i> resolution and the team left.</p> <p>Project documents confirm the lack of appropriate consultations in REDACTED. The Detailed Project Reports do not list any public consultations apart from the meetings of the Village Water and Sanitation Committees (VWSC). For the baseline Environmental and Social Assessments as well as the Tribal Development Plan, consultations were done at the REDACTED level and not for the REDACTED Scheme in particular.</p>	<p>Consultations during preparation stage: During project preparation, consultations were held in connection with the preparation of the SMF and the TDP for Jharkhand. Community consultations and focus group discussions were organized in 60 habitations across 30 GPs covering five districts in February 2013, in addition to consultations with state, district and block officials. The need for piped water supply was raised at each meeting and people expressed willingness to pay for piped water provided a regular supply was assured. South Sarjamda was not among the 30 GPs, so representatives from South Sarjamda would not have participated in these consultations. Consultations on the EA-EMF were also organized at in Khunti, Garhwa, Jamshedpur and Dumka on May 6, 8, 10, and 12, 2013 and a state-level consultation was organized in Ranchi on June 26, 2013. All consultations were in Hindi, which is widely spoken in the state.</p> <p>During Project implementation, a consultation took place at the Sarjamda Panchayat building, with the participation of Bank technical, environment and social consultants during the Implementation Support Mission of October-November 2014.</p> <p>Management was not aware of any written protest against the siting of the ESR before the email to the Bank of October 2018, which provided information, inter alia, on two letters from 2015: (i) a letter dated August 17, 2015, from the contractor to the Executive Engineer (EE) referred to people in Purani Basti objecting to the ESR out of concern that it would reduce the area of the football playing area (no other points of objection were mentioned in this letter); and (ii) a letter dated October 31, 2015, from the EE to the Sub-Division Officer, Jamshedpur, indicated that authorities were aware of resistance to the ESR at the scheme site and mentioned Sarjamda along with other locations; it stated that despite multiple talks led by the Circle Officer, works had not started due to opposition by those who have “illegally occupied /encroached and are causing hindrances.” The letter requested that consultation meetings be organized with the presence of the EE, Circle Officer, Jamshedpur and that police officers of Parsudih, Chhotagovindpur and Bagbera participate. As far as Management has been able to determine, police did not participate in any of the meetings detailed below.</p> <p>Subsequently, three consultations concerning the Chhotagovindpur MVS took place on April 4 and 17, and May 1, 2016, with details as follows:</p> <ul style="list-style-type: none"> <i>April 4, 2016:</i> Meeting in South Sarjamda Panchayat building, which consisted of a training/orientation program for members of the VWSCs and <i>jal sahiyas</i>. The minutes were signed by 38 participants including members of the VWSCs. <i>April 17, 2016:</i> Meeting in North Sarjamda Panchayat building with representatives of all three GPs of the

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		<p>Sarjamda revenue village (North, Middle and South Sarjamda). About 100 people participated. The meeting was focused on resolving the obstacles to the construction of the ESR. The minutes of this meeting were brief and stated only the purpose and designations of officials present; it was not possible to determine whether anyone from Purani Basti participated in this meeting.</p> <ul style="list-style-type: none"> • <i>May 1, 2016:</i> A meeting called an <i>aam sabha</i> (general assembly open to all; not the statutory <i>gram sabha</i>) chaired by the <i>gram pradhan</i> was held on the Janta Maidan of North Sarjamda Panchayat to discuss the opposition to the construction of ESR on the Romantic Maidan of South Sarjamda. The meeting lasted for nearly 5 hours and was captured in at least 10 video clips and many photos. As evidenced from the minutes, video clips and photographs, 197 persons (including many women) participated in this meeting. In order to reach out to the small section of the audience who were more conversant in Bengali, salient features and other aspects were explained in Bengali as well. <p>Management has reviewed the video clips and other materials pertaining to the <i>aam sabha</i> that were made available. While it seems that this meeting was a major and open forum for people to voice concerns and raise questions about the MVS, none of the video clips reviewed by Management included discussion of the location of the ESR and it is not clear whether the Requesters or anyone from Purani Basti participated in this meeting.</p> <p>Key issues, both positive and negative, raised at the May 1, 2016, meeting by those in support and against the scheme were as follows:</p> <ul style="list-style-type: none"> • Following panchayat elections in 2010, PRI representatives demanded that roads, water supply, education and health facilities in the rural panchayats around Jamshedpur be brought up to par with city neighborhoods being serviced by the Tata Group companies. The proposed scheme responds to this demand. • This is a water-scarce area and women spend much time fetching water from different sources and waiting for water tankers; hence, the piped water supply scheme will benefit all those in Parsudih, Sarjamda and other areas covered by the scheme. • The scheme is designed to supply 135 liters of drinking water per capita, per day every day. • Water for this scheme will come from Subarnarekha River, will be treated and then supplied to people; no ground water will be extracted in the villages.

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		<ul style="list-style-type: none"> Communities are to provide a contribution of 1 percent of the overall project cost. Scheduled Tribe/Caste households will pay INR 225/- towards a house connection and later a monthly tariff will be applicable as and when decided. (As a point of comparison: monthly electricity bills in and around Purani Basti are around INR 200/- to 250/-, as indicated by local residents. Cell phone charges begin from pre-paid plans costing INR 23.) Tap water will dry up existing ponds and it will not be possible to undertake cultural and religious rituals (such as rituals for the deceased) that need pond water. If there is water supply in the area similar to the Tata areas and also if a health center comes it will become easier to include this area in the city municipality. This would mean any construction will require approvals from municipal authorities. Concerns were raised that such schemes should be discussed and approved by the <i>gram sabha</i>, and not by an <i>aam sabha</i>, and that traditional leaders have not been respected; authorities should show respect in some manner (for example, construct water tanks with names of traditional leaders). <p>Information and communication material. According to the DPMU, some 6,000 leaflets and 300 brochures containing the information about the scheme have been distributed across the GPs covered under the Chhotagovindpur and Bagbera MVS.</p> <p>Wall writings were made in at least 15 locations in each of the three panchayats (South, North and Middle Sarjamda) in November/December 2017. These provide information about the scheme and other messages relating to water (however, they do not include information about the GRM which was included in brochures that were distributed). Documentary evidence available through the DPMU indicates that completion of the wall writings was confirmed by the <i>mukhiyas</i> of all three GPs of Sarjamda. The Bank team, during its visit on December 23, 2018, observed at least two wall displays in Purani Basti (one near the ESR and one near the complainant's residence).</p> <p>A VWSC was formed in June 2012 in Sarjamda before the initiation of the Project and was instrumental in generating awareness related to water and sanitation.</p> <p>Concerning provision of information in the local language, all scheme-related discussions and IEC material were in Hindi as it is commonly spoken in the state and all consultations were held in Hindi.</p> <p>Subsequently several meetings were conducted including MVWSC meetings in the course of 2018 at which the Chhotagovindpur MVS was discussed.</p>

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7.	<p>Invalid Gram Sabha Resolution. REDACTED is a Schedule V protected area under the Indian Constitution. The Panchayats (Extension to Scheduled Areas) Act, 1996 (“PESA”) applies to all rural Schedule V protected areas. Under PESA, any development scheme or welfare plan to be implemented in a Schedule V area, or any decision regarding common community resources, should be taken with the consent of the village Gram Sabha. The land on which they are constructing the ESR in REDACTED under the jurisdiction of the REDACTED is an independent <i>Gram Sabha</i> of REDACTED. The land constitutes a common community resource for the village community. Therefore, a <i>Gram Sabha</i> resolution is a pre-condition for starting any development activity in the village.</p> <p>In REDACTED, traditional leaders from REDACTED were in Delhi to participate in a program on traditional governance. Taking advantage of the absence of traditional leadership, the construction work for the water tank started. The Indigenous residents of REDACTED have passed several resolutions opposing construction of an ESR in their village.</p> <p>The community is profoundly disturbed by the World Bank’s support of a project that violates Indian law, especially laws designed to protect the rights of Indigenous people.</p>	<p>Management acknowledges that the statutory gram sabha was not carried out to obtain community consent to the siting of the ESR in Purani Basti.</p> <p>The aggrieved residents of Purani Basti with whom the Bank team met on December 23, 2018, showed the team their own habitation community meeting register, which indicated that on at least three occasions (March 3, 2016, April 17, 2016 and May 2, 2016), the community discussed the scheme, documented its opposition to the construction of the ESR and made demands to hold a <i>gram sabha</i> at Sarjamda. However, no <i>gram sabha</i> was held. According to the <i>mukhiya</i> of South Sarjamda GP, the <i>gram sabha</i> did not take place due to a lack of a quorum and because of the failure to constitute this quorum, an <i>aam sabha</i> (a general assembly open to all, including those outside the GP, which does not have statutory authority) was called to discuss the scheme. An undated announcement inviting people to come to the <i>aam sabha</i> to voice their views on the water supply scheme is available through the DPMU. This meeting took place on May 1, 2016, lasted almost five hours and is recorded on video, in photographs and in minutes (see above). It is of note that members of the Purani Basti community made a notation in their register on May 2, 2016, one day after the <i>aam sabha</i> of May 1, 2016. This may suggest that members of the Purani Basti community, in recording their demand for a <i>gram sabha</i>, were protesting the fact of the <i>aam sabha</i> that had taken place one day earlier.</p> <p>Further, since the formation of the VWSC in 2012 and of the MVWSC in January 2018, numerous local consultations were held covering such project details as: the laying of pipes, restoration of roads/drains, timely depositing of capital contributions, updating of passbooks, finalization of the composition of the VWSC in some panchayats, and quality of construction.</p>
	<p>Operational Policy on Environmental Assessment OP 4.01</p>	
8.	<p>Erroneous Project Categorisation</p> <p>Bank management has wrongly categorised this project as a category B project, which lowered the required level of environmental assessment. Under the World Bank Policy on Environmental Assessment, a proposed project is classified as Category A "if it is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works." A potential impact is considered "sensitive" if it may be irreversible (for example, lead to loss of a major natural habitat) or raise issues covered by OP 4.04, Natural Habitats; OP/BP 4.10, Indigenous Peoples; OP/BP 4.11, Physical Cultural Resources or OP 4.12, Involuntary Resettlement.</p>	<p>In Management’s view the size and impacts of the individual schemes supported under the Project justifies the categorization of the Project as Category B.</p> <p>Based on the information available at the time of preparation, the Project was assigned environmental Category B because it was not expected to have significant adverse environmental or social impacts (Project Appraisal Document, p.43).</p> <p>As the Project involved numerous schemes, the locations of which were not known at the time of Project approval, a framework approach was adopted to address environmental and social risks and impacts.</p> <p>The Project Appraisal Document also noted that upfront environmental screening of the schemes would be carried out to identify potential negative impacts and mitigation</p>

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	<p>The REDACTED scheme is one of the many large multi-village schemes that are being implemented under the Project. In at least one state in which the Project is being implemented (i.e., Jharkhand), there will be wide-ranging impacts on Indigenous Peoples, including issues covered under OP/BP 4.10. Moreover, construction of large multi-village schemes requires infrastructure creation which often has diverse and wide-ranging impacts on ecology, human health and safety, resources, and rights of people. Furthermore, the Project envisages monetising access to drinking water for rural communities in India. This is likely to have unprecedented impacts on impoverished rural communities in all four states if they currently have free access to drinking water. Bank management did not adequately consider the serious adverse impacts of these multi-village schemes on the impacted communities and their physical cultural and water resources at the time of project screening.</p> <p>The REDACTED Scheme, in particular, involves serious and multidimensional environmental concerns, as well as impacts on critical cultural and economic resources of Indigenous communities. A large-scale infrastructure development project that has the potential to irreversibly destroy or damage a physical cultural resource, such as the martyrdom spot, must be considered a “sensitive” adverse environmental impact within the scope of the definition of a Category A project.</p> <p>The impacts go beyond the physical structures in REDACTED and other villages. The REDACTED Scheme proposes to extract significant volumes of water from the REDACTED river, which is likely to have adverse impacts on the hydrology of the area. Most of the impacted villages are Indigenous villages where local bodies of water, like ponds and wells, form a key component of many cultural practices. Diversion of the water of the river, which feeds groundwater and other water reservoirs in the area, can have significant negative impacts on local bodies of water in these villages, thereby affecting the cultural practices and way of life of many Indigenous communities. The potential adverse impacts of the REDACTED Scheme on the hydrology of the region have the potential to be significant and irreversible.</p> <p>Additionally, even though the World Bank is not directly funding the REDACTED Urban Agglomeration Plan, the reality is that the Bank-funded REDACTED Scheme is a key component of the proposed Urban Agglomeration Plan. As described above, this Plan will adversely impact several Indigenous villages. The urbanisation of the rural areas around REDACTED will also significantly increase the run-off into the REDACTED rivers surrounding these areas. The community fears that increased urban run-off to these rivers, accompanied by the mass abstraction of water</p>	<p>measures, in accordance with the EMF and SMF. Management confirms that the Environmental Category B is adequate for this Project.</p> <p>OP 4.10 on Indigenous Peoples is applicable to the Project, and a TDP was prepared that is consistent with the requirements of the policy. However, no scheme-specific social assessment was undertaken.</p> <p>Management recognizes that there have been shortcomings in the application of OP 4.01 and OP 4.10, especially with respect to consultations and public disclosure in Hindi.</p> <p>Water abstraction. No impact from the river water abstraction on the groundwater levels in Sarjamda is expected. The water that will be supplied is abstracted from the Subarnarekha River, which is the only source for the Chhotagovindpur MVS. The water intake of the Chhotagovindpur MVS is located downstream from the confluence with the Kharkai River at a location called Luwabasa, at 7.8 kilometers from the Sarjamda ESR. Discharge data for the Subarnarekha/Kharkai in Jamshedpur show that the lowest water flow in the river in the past 8 years (in 2010-2011) was 6 m³/s or 518.4 million (or mega) liters per day (MLD). The peak design demand of 43 MLD represents 8 percent (43/518.4 MLD) of this minimum recorded flow. The same peak design demand represents 0.2 percent of the lowest recorded maximum flow (also in 2010-2011) of 240 m³/s. As per the scheme design, the maximum amount of water withdrawn, 43 MLD, is negligible compared to the total river flow.</p>

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	<p>from them, may lead to devastating impacts on the aquatic ecosystem, hydrology, hydro-geology, direction and nature of river flow, and erosion patterns.</p> <p>Given the potential for diverse, large-scale, and unprecedented impacts on Indigenous communities in the region, the Scheme required a rigorous environmental assessment which should have been done as per Category A standards. The hydrology impacts alone of these large multi-village schemes should have required independent, internationally recognised hydrology experts as per the requirements of the Operational Policy on Environmental Assessment.</p> <p>The Bank failed to do an adequate project screening, which in turn caused a failure to adequately assess the potential impacts of the RWSS-LIS and the various sub-projects under it. A proper and timely Category A Environmental Assessment for the REDACTED Scheme would have provided the necessary opportunity for the Bank to fully analyse risks and issues presented by the REDACTED Scheme, and to identify alternative approaches that would have minimised adverse impacts and maximised possibilities to restore and improve the environment.</p>	
9.	<p><i>Inadequate Environmental Assessment</i></p> <p>The implementing authority did not do an adequate environmental assessment for the REDACTED component of the REDACTED Scheme, despite large-scale potential adverse impacts. The Baseline Environmental Assessment & Environmental Management Framework (“EA-EMF”) for the state of Jharkhand as a whole did not examine potential adverse impacts of sub-projects. Instead, it noted that for sub-projects, an Environment Data Sheet and categorisation into Category 1 or 2 was needed. In the case of Category 2 sub-projects, a detailed environmental appraisal was required. There is no indication that these requirements were fulfilled in the case of the REDACTED Scheme. None of these documents are publicly available. We were told that when the REDACTED requested these documents through an RTI application, he was instead provided with the Detailed Project Reports and Preliminary Design Reports. The Detailed Project Reports for the REDACTED component does contain an environment study, however it is lacking on several fronts.</p> <p>A large infrastructure project of this scale requires a comprehensive environmental assessment. The environment study done for the REDACTED component does not fulfil that requirement. The environment study wrongly concludes that the proposed structures will be on governmental land and</p>	<p>The Project’s environmental and social management is based on a framework approach. In the framework approach, an EDS is the initial instrument to screen the scheme and identify the likely environmental issues based on the scheme design. After the EDS screening, a scheme-specific EMP is prepared.</p> <p><i>Scheme-specific EMP.</i> The ESR that is the subject of this Request for Inspection is part of the Chhotagovindpur MVS. The scheme was classified as a Category 2 scheme, requiring a detailed scheme-specific environmental appraisal to be included in and to inform an EMP.</p> <p>The consolidated EMP for the Chhotagovindpur and Bagbera MVSs was prepared by the contractor. This EMP was originally submitted for government approval in July 2015 and approved by district authorities in 2017. Bank missions that took place from July 2015 to late 2018 reviewed the EMP and found it to be inadequate, as advised in comments to the Project authorities.</p> <p>Management acknowledges that under the EMF the responsibility to develop the EMP rests with the district authorities. In the case of MVSs, the practice under the Project has been to delegate the preparation of the EMP to the contractor, while approval remains with the government.</p> <p>As per agreed implementation procedures, an EDS and a preliminary EMP, based on the preliminary design of the scheme, should have been attached to the DPR to inform the bidding process, and the bidding document should</p>

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	<p>will not impact private land. It does not take into account the structures constructed on common community land. There has been no assessment of the impacts of the REDACTED Scheme on Indigenous communities, their autonomy, and physical cultural resources. It does not assess the impacts of the REDACTED Scheme on the hydrology of the area. This study does not include an Environment Data Sheet or information about sub-project categorisation. It also fails to assess alternative ESR locations.</p> <p>The apparent failure to conduct a proper environmental assessment is a clear violation of the World Bank's Safeguard Policy on Environmental Assessment. It indicates a failure on the part of Bank management to monitor sub-projects properly and ensure compliance with the World Bank's Safeguard Policies. The Bank's supervision of the DWSD, REDACTED was insufficient and wanting, and as such violates the requirements of OP 4.01.</p>	<p>have specified that (i) the preliminary EMP should be updated based on actual design and analysis of alternatives provided by DBOT contractor and that (ii) no work could start until the EMP was adequately reviewed and approved. Prior informed consultations should have taken place as part of the EDS and DPR preparation and a summary of the consultations and main points raised should have been reflected in the DPR as well as in the preliminary EMP. These important aspects of the environmental management process did not take place in this case, and the Bank missed an opportunity to ensure that an EDS and preliminary EMP were developed and to ensure that the contract document specified ineligibility of work prior to approval of the updated EMP before providing its "no objection" as part of the procurement process of the contract for the MVSs.</p> <p>Management also acknowledges that the scheme-specific EMP should have been finalized by the counterpart and submitted to the Bank for prior review and approval (Project Agreement Section I.A.2.c.ii) prior to the start of the works in October 2016. In this case, these requirements were not met and the Bank also missed an opportunity to ensure that these requirements were fulfilled.</p> <p>Following the November 2018 mission, the Bank team requested the counterpart to require the contractor to: (i) update the EMP; (ii) bring it into compliance with the EA-EMF; and, (iii) separate the combined EMP into two, one EMP for the Chhotagovindpur MVS and one for the Bagbera MVS. The contractor submitted separate EMPs for the Chhotagovindpur MVS and the Bagbera MVS to the district authorities, who conveyed them for the Bank's review on December 13, 2018. These documents did not integrate most of the Bank comments. The contractor has committed to incorporating the comments and submitting the updated and separated EMPs to the district authorities, who will convey the documents for the Bank's review by end-February 2019. In addition, the Bank team requested that monitoring and reporting of EMP implementation be strengthened and advised the contractor, SPMU and DPMU to publicly disclose the approved and updated EMP in all concerned GPs and habitations as well as at the DPMU and contractor's offices.</p>
10.	<p><i>Lack of a proper mechanism for sludge disposal</i></p> <p>A water supply scheme of this level will generate enormous amounts of sludge. It is, therefore, concerning that neither the Detailed Project Report nor the Preliminary Design provide any indication as to where the sludge will be disposed. The Detailed Project Reports merely give a vague outline of the process for sludge disposal. However, the environment study does not do an objective assessment of the sludge that will be produced through the REDACTED Scheme and the process for disposing it. Furthermore, the location where such sludge will</p>	<p>The only infrastructure in the MVS which generates sludge is the WTP of the scheme located in HUDCO park in Jamshedpur. This sludge will be handled appropriately and will have no direct impact on the Purani Basti community.</p> <p>The raw water intake is located at a point where the water is least expected to contain heavy metals. Management has reviewed the water analysis performed in the last 12 months at the water intake of the WTP, which shows very low levels of heavy metals in the raw water, almost at the level of Indian Standard IS 10500 2012 on Drinking Water. The WTP is designed to be able to remove heavy metals and other contaminants to ensure that the drinking</p>

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	<p>be disposed of, has not been disclosed.</p> <p>Residual sludge generated from water treatment processes can be toxic. It can have suspended solids, pathogens, and heavy metals. Such sludge, if not properly disposed of, can further contaminate the receiving waters and adversely impact aquatic ecosystems as well as water chemistry. Such sludge is also likely to have heavy metal residuals, which can be toxic to phytoplankton and zooplankton and to higher aquatic plant and animal species, including fish. The community fears that the use of chlorine for water treatment can lead to chlorine residuals in the sludge, which can be highly toxic.</p> <p>Given the potentially alarming levels of toxicity in the discharged sludge, the Detailed Project Report and Preliminary Design Report should have discussed these risks and provided details about sludge disposal. The fact that the reports lacked relevant and important information regarding sludge disposal should have been a cause of concern for the Bank. The Bank Task Team should have looked into these components before approving the reports. Even a rudimentary environmental assessment for a water treatment project must include details about the project's sludge disposal process, where such sludge will be disposed of, and the environmental feasibility of the same. Such an oversight by the Bank suggests that the scope and level of scrutiny employed by the Bank was deficient.</p>	<p>water is delivered according to standard. The specific approach to sludge management and disposal will be in place by the time the WTP begins operation, planned for February 2019. It will be detailed in the updated EMP and will be supervised by the DWSD of the State of Jharkhand. Based on the low levels of heavy metal contaminants, the sludge from the WTP should not be considered as a toxic waste. Management will request district authorities to advise the contractor on an appropriate discharge site for the water treatment sludge and will request the DPMU to share the water testing results with the community.</p>
11.	<p><i>Lack of Public Consultation</i></p> <p>Under the World Bank's Environment and Social Safeguard Policy ("ESSP"), the borrower is supposed to consult project-affected groups about the project's environmental impacts and take their views into account. However, this Policy has been violated with respect to the REDACTED Scheme.</p> <p>As described above, no proper consultation took place with the REDACTED residents. The Jharkhand Baseline EA-EMF claims that it was developed through broad CONSULTATIONS across Jharkhand. The scope of these consultations was to assess the existing status of water supply, sanitation, public health, and personal and environmental hygiene. It seems these consultations did not make a rigorous attempt to understand the impacts of planned components of the Project on project-affected people. An environmental assessment as per the ESSP has to evaluate a project's potential environmental risks and impacts and examine project alternatives. Public consultations related to an environmental assessment should, therefore, include consultations specifically regarding these aspects. The Bank should properly monitor and review the scope of an EA- EMF for all sub-projects, including scrutiny of the nature and extent of</p>	<p>See Item 6 above.</p>

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	<p>consultations. The extremely narrow scope of the EA-EMF consultations falls short of the requirements for an EA-EMF and indicates a failure on the part of the Bank to appraise DWSD's work properly.</p> <p>Little attempt has been made to take community views into account even though construction of a key component of the Scheme is happening on land to which the community has deep historical and cultural ties. The community believes that the REDACTED Scheme does not fulfil the ESSP's requirements for public consultations.</p>	
12.	<p><i>Inadequate Information Disclosure</i></p> <p>The World Bank has failed to ensure fulfilment of its information disclosure requirements in this Project. Under World Bank policy, the borrower is supposed to provide relevant material in a timely manner prior to consultation and in a form and language understandable and accessible to project affected people. In the case of the REDACTED Scheme, the implementing authority never provided any documents to the community. There is also no information about the Scheme on the World Bank's website. In fact, the World Bank's website only has documents for Jharkhand as a whole, which discuss the over-arching RWSS-LIS. The community, first realised the World Bank is funding the REDACTED Scheme through media reports. The information disclosure for the REDACTED Scheme falls far short of meeting the ESSP requirements.</p>	See Item 6 above.
	Operational Policy on Indigenous Peoples OP 4.10	
13.	<p>The Bank's Indigenous Peoples Policy OP 4.10 applies to the REDACTED implementation in REDACTED. Most of REDACTED population comprises of the <i>Santhal</i> and <i>Ho</i> Indigenous communities. The <i>Santhal</i> and <i>Ho</i> are impoverished communities in East and Central India that have suffered marginalisation because of rapid industrialisation at the cost of their ancestral land and resources. They identify as <i>Adivasis</i> and are recognised as Scheduled Tribes under the Constitution of India. Both, <i>Santhal</i> and <i>Ho</i> communities have their own traditional governance, and decision-making structures, as well as cultural and spiritual practices that are distinct from mainstream practices. The <i>Santhal</i> traditional governance system is called the <i>Majhi Pargana Mahal</i> and the <i>Ho</i> traditional governance system is called <i>Munda-Manaki</i> system. The <i>Santhals</i> speak Santhali and members of <i>Ho</i> community speak Ho language. Based on these facts, it can be concluded that the <i>Santhal</i> and <i>Ho</i> residents of REDACTED are Indigenous communities for the purpose of the Indigenous Peoples Safeguard Policy.</p> <p>Under the Policy, the Bank is supposed to ensure that Indigenous communities receive social and economic</p>	<p><i>Consistent with the requirements of OP 4.10, the TDP was prepared during Project preparation, consulted upon and adopted in March 2013 for the State of Jharkhand. It includes provisions to ensure that tribal-specific practices are adequately taken into consideration in the Project, and that informed consultations regarding schemes affecting tribal populations take place in culturally appropriate ways.</i></p> <p>Key provisions proposed in the TDP (Page 47-57) include:</p> <ol style="list-style-type: none"> Habitation level DPR, a technical document informing the tender process, to be endorsed by both the VWSC and the GP. Once the GP approves the plan, it is forwarded for sanction to the DPMU which in turn seeks approvals from DWSD/SPMU. Support Organizations to provide community organization and capacity building support. Convergence with other government schemes. Training of stakeholders, exposure visits. Developing of cadre functionaries (<i>jal sahiyas</i>). Training of local masons and plumbers. Involvement of Accredited Social Health Activist

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	<p>benefits in a culturally appropriate manner. The lack of appropriate consultation, risks to important Indigenous resources and cultural and historical heritage, and the manner in which the ESR is being constructed on the community's common property resource is worrisome. The community believes that the Bank's actions with regard to planning and implementation of the RWSS-LIS, and specifically the REDACTED Scheme, disrespect and threaten the dignity, human rights, economy, and cultures of Indigenous Peoples.</p>	<p>(ASHA) workers.²³</p> <p>viii. Consultations during implementation (implementation of the IEC/Communication plan for awareness creation)</p> <p>ix. Community contribution from Scheduled Castes and Scheduled Tribes at INR 225/- (US\$3) and INR 450/- (US\$6) for others.</p> <p>With respect to application of the TDP, the information available shows that:</p> <p>i. The DPR for the contract of the Chhotagovindpur and Bagbera MVSSs was not endorsed by every one of the 38 concerned VWSCs and GPs. The provisions of the TDP referred to this endorsement in singular, thus presumably only in the context of SVSSs (one VWSC, one GP).</p> <p>ii. Additionally, during the Project preparation period and even before the establishment of DPMUs in 2014, there was a specialized agency hired as the District Project Management Committee to support DPMUs. Its role included: "Supporting village communities in holding village meetings or <i>gram sabhas</i> to inform and agree on (a) water supply scheme and sending a proposal to the department for the same; (b) communities indicating desire to have household level pipe connections; (c) communities agreeing to provide land for the scheme; (d) discussion relating to O&M of the scheme; (e) agreeing to the connection charges."</p> <p>iii. Support Organizations were hired for an initial period of nine months in 2016-17 to undertake baseline surveys and training programs but were subsequently discontinued as this model proved unsatisfactory.</p> <p>iv. In May 2018, Community Organizers were in place for mobilization and sensitization on the scheme and collection of contributions to capital and operating expenditures.</p> <p>v. One training was organized at VISWA (a Training Institute of the Department of Water Supply) in August-September 2017, in which four members (President, Vice President, <i>jal sahiya</i>-Treasurer and one active member) from each VWSC in the Chhotagovindpur MVS participated. The training lasted two days and covered information about the scheme, the Project, the role of the VWSC and MVWSC, financial management, bookkeeping, role of <i>jal sahiyas</i> etc.</p> <p>vi. All VWSCs in the Project area were formed in 2012 and reconstituted in 2015 following panchayat elections and have been active throughout. The</p>

²³ These are community level health workers instituted by the GoI's Ministry of Health and Family Welfare.

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		<p>MVWSC for the Chhotagovindpur scheme was formed in January 2018.</p> <p>vii. Cadre functionaries: <i>Jal sahiyas</i> have been operational across the state including in this area.</p> <p>viii. Involvement of ASHA workers: <i>Jal sahiyas</i> instead of ASHA workers are active here.</p> <p>ix. Consultation during implementation: Related IEC material is being improved.</p> <p>x. Collection of community contributions is in progress.</p> <p>The Aide-Memoire of the first implementation support mission in June 2014 refers to initiating the preparation of a TDIP, to complement the TDP with specific actions and processes to facilitate its implementation. The TDIP was prepared through several rounds of district-level consultations with tribal leaders, members of civil society and academicians, and through workshops held at state level. It was reviewed by the Bank several times. The finalization of the TDIP was delayed by the departure of the Tribal Development Expert from the SPMU. The post remained vacant for about two years but was filled in February 2018, which led to the finalization of the TDIP. The Bank provided comments in March and May 2018. It was approved by the executive committee of the Project on August 9, 2018, after which the SPMU started its implementation.</p> <p>The TDIP also includes renovation of traditional water sources, IEC dissemination in local languages, convergence of Government schemes with toilet construction, and exposure visits for traditional tribal leaders/tribal VWSC members to successful water schemes.</p> <p>Management recognizes that there have been shortcomings in the application of OP 4.01 and OP 4.10, especially with respect to consultations and public disclosure in Hindi.</p>
14.	<p><i>Lack of free, prior, and informed consultation</i></p> <p>Regrettably, the development of the REDACTED Scheme neglected most of these requirements [of OP4.10. The communities in REDACTED were kept in the dark and excluded from the decision-making process for the implementation of the REDACTED Scheme. The community was not asked if they required piped water or how they wanted water supplied. According to the Tribal Development Plan prepared for Jharkhand, the Detailed Project Report was to be approved and consulted on at the habitation level.</p> <p>The Indigenous communities in REDACTED takes all the decisions after rigorous consultation processes involving the whole <i>Gram Sabha</i>. REDACTED, REDACTED residents, have passed numerous resolutions opposing the construction of the ESR at REDACTED". The community also raised their</p>	<p>Free, prior and informed consultations with residents of the habitations directly impacted by the scheme infrastructure should have taken place as part of the DPR preparation, prior to its approval by district authorities. In keeping with the TDP, consultations, including notably for MVSSs, should have continued during the implementation phase of the Project to discuss, among other issues, the siting of the scheme infrastructure.</p> <p>While district authorities, the DPMU, and the contractor met with the community at or near the proposed ESR site to discuss the upcoming works, these discussions were not properly recorded through minutes and attendance sheets. There are, however, pictures and video recordings by DPMU staff and the contractor, which document a gathering involving the <i>mukhiya</i> of the South Sarjamda GP at the ESR site on February 8, 2016. The contractor also shared pictures of what may have been a groundbreaking</p>

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	<p>grievances with the Project through letters to local authorities.</p> <p>Under the Policy on Indigenous Peoples, the Bank must undertake a screening to determine whether Indigenous Peoples have a collective attachment to project land. It seems there was no such screening for the REDACTED Scheme. The Bank must consult with the affected Indigenous communities during the screening process, but the REDACTED community was not consulted on any aspect of the REDACTED Scheme. This suggests that World Bank management failed to take steps to do a proper appraisal of risks to Indigenous communities.</p> <p>The project documents do not disclose any attempts made to ascertain if the REDACTED Scheme has broad community support. According to the Tribal Development Plan for Jharkhand, self-selection by Indigenous communities from the habitation/village was supposed to be a central principle under the RWSS-LIS. However, in the case of the REDACTED Scheme, it has been forced upon the communities despite their vehement opposition.</p> <p>As highlighted earlier, the Scheme appears to be part of a larger process to urbanise constitutionally protected Indigenous areas. The Indigenous communities in the area do not require piped water supply. They have adequate access to water in their village free of cost. Instead, the demand for piped water is coming from irregular housing colonies of non- Indigenous communities that have emerged around REDACTED and other Indigenous villages, who have long been complaining about a shortage of water. Using their Indigenous ancestral resources, the REDACTED Scheme is neither wanted nor needed, but is being imposed on the REDACTED community. These facts show that a process of free, prior, and informed consultations did not take place.</p> <p>The Tribal Development Plan for Jharkhand acknowledges that traditional governance institutional systems have substantial influence in Indigenous areas and that “people often have more faith in these than PRIs and VWSCs.” The Tribal Development Plan recognises that “inclusion of traditional tribal institutions will be critical as they have substantial influence in their respective tribes.” REDACTED village is organised under the <i>Majhi-Pargana</i> as well as the <i>Munda-Manaki</i> system. Yet, for the implementation of the REDACTED Scheme, the <i>Majhi-Pargana</i> and the <i>Munda-Manaki</i> systems were sidestepped.</p>	<p>ceremony for the ESR on March 11, 2016.</p> <p>At the same time, there is strong evidence of demand for piped water in the scheme area. According to data provided by the DPMU, in South Sarjamda, there were 1,637 households as per the DPR and 1,474 households as per the recent baseline survey. The contractor’s obligation is to lay pipes to enable 1,474 households to connect. Of this total, 886 households have already paid their community contribution and 680 households (77 percent) have been provided with a house connection. (Parts of Purani Basti are not part of the planned coverage as reflected in the contractor’s scope of work. It is possible that some of those who signed the Request for Inspection are not covered by the scheme.)</p> <p>As noted earlier, there is no evidence that any written complaints on this subject were filed with the Project or local authorities either directly or through the grievance redress mechanism. During the Bank team’s interactions with communities at Purani Basti on December 23, 2018, though requested, the communities were unable to provide any copies of resolutions or complaints related to the ESR. However, interlocutors shared with the Bank team that they had been recording their grievances in their own register and that they did not know whom to approach to file a complaint.</p> <p>Management understands the Requesters’ concerns regarding urban expansion and the perceived threat of tribal villages losing certain legal protections afforded to them as Scheduled Areas by being integrated into the city. However, urbanization and urban expansion in India are significant and driven by many factors. There is no link between the mentioned draft master plan to expand the Jamshedpur urban area and this Project, which aims to provide water to rural communities, nor was it mentioned during consultations that took place for Project preparation.</p>
15.	<p><i>No assessment of the negative impacts of REDACTED Scheme on Indigenous community resources</i></p> <p>The World Bank Policy on Indigenous Peoples makes clear that even for large projects which have multiple</p>	<p>As part of the TDP and social assessment studies in Jharkhand, focus group discussions were held in East Singhbhum District at which the subject of the availability and quality of water supply was discussed. No opposition</p>

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	<p>sub-projects, if the screening of an individual program or sub-project indicates that Indigenous Peoples are present in, or have collective attachment to, the area of the program or sub-project, the borrower must ensure that, before the individual program or sub-project is implemented, a social assessment is carried out, and an Indigenous Peoples Plan (IPP) is prepared.</p> <p>The “issues for consideration” described in the Jharkhand Tribal Development Plan do not include issues arising out of community opposition to projects and their various components due to impacts on community resources. Instead, they are limited to improving access to water and toilets. There is no indication that a social assessment was conducted to evaluate the REDACTED Scheme’s potential positive and adverse effects on Indigenous Peoples or “to examine project alternatives where adverse effects may be significant.” In fact, the Baseline Social Assessment for Jharkhand makes an incorrect assessment that the program interventions will not impact Indigenous communities. The World Bank Task Team appears to have overlooked these contraventions of the Safeguard Policy on Indigenous Peoples.</p> <p>As described in detail above, the ESR is being constructed on common community property of the community. This land has deep historical significance for the community and is deeply tied to their traditions and cultural practices. The REDACTED Scheme is also closely linked to the Jharkhand Urban Agglomeration Plan that threatens to fundamentally change the nature of this Indigenous area and convert it into an urban zone. Thus, the social assessment should assess the negative impacts of the Proposed Urban Agglomeration Plan as well.</p>	<p>to the schemes was voiced during these meetings. The TDP records that “<i>The coverage of rural water supply and sanitation services is very low in Jharkhand. Besides, there are water quality related issues too, with many places mainly reporting Fluoride and Iron contamination. 49% of the population is dependent on hand pumps for their water-the remaining meet their needs from a variety of sources, such as, wells, ponds, rivers, streams, piped sources, etc. The sanitation facilities in the rural areas too leave much to be desired.</i>” (p. 8, TDP).</p> <p>Management acknowledges that although OP 4.10 on Indigenous Peoples was applicable, no scheme-specific social assessment was undertaken.</p> <p>No concern regarding the negative impacts of possible urban agglomeration was raised during the preparation of the social assessment report and, hence, the topic was not covered in the social assessment.</p>
16.	<p><i>Absence of a mitigation plan to provide remedy for the negative impacts of the REDACTED Scheme on Indigenous communities</i></p> <p>OP 4.10 requires that where adverse impacts are unavoidable, the borrower must minimise, mitigate, or compensate for such effects. The Detailed Project Report does not contain a mitigation plan to remedy the negative impacts that the REDACTED Scheme is likely to cause Indigenous communities, nor have they been compensated for the harm already caused. Moreover, after the completion of the scheme, the community will be forced to pay money to access water. The only mitigatory step undertaken by the Project implementing authorities was the construction of a statue of the martyrs as a replacement of the REDACTED (martyrdom site). However, no consultation was done with the community before placing these statues and razing the original martyrdom site. Had there been a consultation, the</p>	<p>See Item 13. In addition, Management notes that the site selected for the ESR was vacant government land and there are conflicting views expressed by different groups in respect of its usage prior to the ESR construction. Less than 14 percent of the plot is being used for the ESR and the rest is available for the community’s use. The ESR has not triggered any direct impact on use of land or livelihoods. Therefore, no mitigation measures were required. However, certain measures proposed in the TDP aim to promote inclusive, equitable and sustainable water supply and sanitation delivery through fostering and empowering grassroots tribal institutions as detailed below.</p> <ul style="list-style-type: none"> • In the Chhotagovindpur MVS, there are 21 <i>jal sahiyas</i> and all of them are members of MVWSC and are active. • Of the two Community Organizers in South Sarjamda GP, one is a resident of Purani Basti habitation and is

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	community would have been able to communicate it to the Project implementing authorities that their community does not believe in erecting statues.	<p>a Santhal.</p> <ul style="list-style-type: none"> The MVWSC of the Chhotagovindpur scheme is comprised of 42 members, consisting of all the <i>mukhiyas</i> and <i>jal sahiyas</i> from the VWSCs of the 21 GPs included in the scheme. As per the TDIP (August 2018), IEC materials are to be developed in local tribal languages and dialects – Mundari, Ho, Santhali, Khortha and Nagpuri – based on tribal population profiles. For SVSs, 36 plumbers and pump operators were trained in East Singhbhum District. These operators and plumbers will be deployed locally. For the MVS, as per the DBOT contract, the contractor is responsible for O&M of the scheme for five years after the completion. Tribal households are required to pay INR 225/- (approx. US\$3), which is half of the capital expenditure amount paid by non-tribal households.
	Operational Policy on Physical Cultural Resources OP 4.11	
17.	<p><i>Impacts on physical cultural resources not taken into account in the project design</i></p> <p>The Bank's policy on Physical Cultural Resources requires a borrower to address impacts on physical cultural resources in projects proposed for Bank financing, as an integral part of the environmental assessment process. This is true even for projects involving sub- projects like the REDACTED Scheme. The Baseline and Impact Assessment should include: "(a) an investigation and inventory of physical cultural resources likely to be affected by the project; (b) documentation of the significance of such physical cultural resources; and (c) assessment of the nature and extent of potential impacts on these resources." The borrower is supposed to have extensive consultations with project affected groups for identifying physical cultural resources because they are often undocumented or unprotected by law. In the REDACTED Scheme documents, there again is no indication that any steps were taken to identify physical cultural resources that will be impacted by the project. In the Concept Stage ISDS for the Project, the Task Team did not envisage applicability of the Safeguard Policy on Physical Cultural Resources OP/BP 4.11. Management's initial appraisal of the project design is weak and fails to adequately consider the true extent of impacts on physical cultural resources. The Baseline EA-EMF also concludes that no existing cultural property will be damaged. However, the EA-EMF does envisage "possible damage to places of cultural, heritage and recreational importance" as a construction stage</p>	<p><i>Management acknowledges that OP 4.11 was not applied to the Project and is now of the view that it should have been applied. Management notes, however, that efforts were made by the implementing agency to achieve objectives that are consistent with those of the policy.</i></p> <p>Prior informed consultations with the directly impacted habitations should have taken place as part of the DPR preparation, prior to its approval by district authorities. Although consultations by the DPMU, district authorities and a Bank team took place with community members at or near the ESR site prior to the start of work (in November/December 2014), these are not documented to the extent required to meet policy requirements.</p> <p>According to the contractor, the land where the ESR was built was undeveloped (bare) before the start of construction. Historical satellite images also confirm that no visible artefact or structure was erected on the 35m x 35m plot used for the ESR construction.</p> <p>Consultations undertaken as part of the preparation of the DPR, TDP and EDS should have been documented by the DPMU and the contractor. Going forward, the Bank team will support the Government of Jharkhand to consult with concerned members of the Purani Basti, South Sarjamda community on the ESR to better understand their concerns and to identify and agree on possible measures to address project-related impacts especially related to cultural and religious sentiments.</p> <p>During the Bank's team visit to the site on December 23, 2018, interactions with community members yielded contradictory evidence on the usage of the Romantic</p>

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	<p>environmental impact.</p> <p>As mentioned, the site of the ESR in REDACTED is a common cultural resource of the community. They use this space for various cultural practices including customary practices associated with REDACTED and the customary feast after REDACTED. It is also a memorial site in the memory of REDACTED men who gave their life for the struggle for Jharkhand's statehood. The impacts on the common community resources was not taken into account at any stage in the project.</p>	<p>Maidan for worship or cultural events. See Item 2 above.</p> <p>As detailed in Item 3, during the December consultations, the Bank team heard contradictory accounts of the details pertaining to the placing of the statues to the men who died in Jharkhand's statehood movement.</p> <p>Management is committed to continuing to meet with concerned community members in South Sarjamda GP to gain a better understanding of the physical cultural resources of the ESR site and of working with the Government of Jharkhand, the Project authorities and concerned communities to agree on appropriate mitigation measures.</p>
18.	<p><i>No steps to mitigate the impacts on community cultural heritage</i></p> <p>Bank policy requires the borrower to develop a physical cultural resources management plan if there are impacts on physical cultural resources. Such a management plan should include measures for avoiding or mitigating any adverse impacts on physical cultural resources, provisions for managing chance finds, any necessary measures for strengthening institutional capacity, and a monitoring system to track the progress of these activities. Even for projects involving sub-projects, the Bank is supposed to ensure implementation of mitigation measures and monitor them during project implementation.</p> <p>However, the Environmental Management Framework developed under the Baseline EA- EMF does not provide any measures to avoid or mitigate impacts on physical cultural resources. The environment study for the REDACTED component of the Scheme does not consider impacts on physical cultural resources. As already mentioned, the supposed mitigatory step undertaken by constructing the statute of martyrs was done without any consultation with the community. The community does not believe in having statues. Bank management's supervision with respect to impacts on physical cultural resources has been especially lacking.</p>	<p>The Project process involves prior informed consultations with directly impacted habitations as part of:</p> <ul style="list-style-type: none"> i. DPR preparation prior to approval by district authorities; and ii. Developing the scheme-specific TDP. <p>These consultations, if carried out sequentially and documented, provide a clear understanding of the various issues at the site of physical, cultural and religious significance and of environmental sensitivities.</p> <p>Based on the Bank team's visit to the site on December 23, 2018, district authorities and the contractor acknowledged that these consultations were not undertaken as they should have been, particularly at the habitation level.</p>
19.	<p>Violations of Indian and International Law</p> <p>The Bank Policy OP 4.01 on Environmental Assessment requires that the environmental assessment consider "the country's overall policy framework, [and] national legislation...related to the environment and social aspects..." and "identify matters pertaining to the project's consistency with national legislation or international environmental treaties and agreements."</p> <p><i>Violation of Constitutional Provisions</i></p> <p>Schedules V and VI of the Constitution of India provide for self-governance in tribal majority areas</p>	<p>The Bank has no role in opining on compliance with Indian law or the constitution.</p>

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	<p>under Article 244. The object of Schedule V is to preserve the autonomy, culture, and economic empowerment of Indigenous or tribal peoples to ensure social, economic, and political justice in the scheduled area. Clause 5(2) of Schedule V prohibits the state from transferring public/state land in Scheduled areas to non-tribals. The public policy rationale for this law is to preserve peace and safeguard the tribal way of life: if the Government transfers the public land to non-tribals, “peace would be disturbed, good governance in scheduled area would slip into the hands of the non-tribals who would drive out the tribals from scheduled area and create monopoly to the well-developed and sophisticated non-tribals....”</p> <p>This makes clear that it is illegal and unconstitutional for the state to transfer land in REDACTED a recognised scheduled area, to a corporation for the construction and operation of a water treatment plant. In this case, REDACTED and REDACTED, was given possession of the common community property.</p> <p><i>Violation of PESA and Jharkhand Panchayati Raj Act (“JPRA”)</i></p> <p>Under PESA, any plan or proposal that is presented by the <i>Gram Panchayat</i> has to receive prior approval, after consultation, from the <i>Gram Sabha</i>. The <i>Gram Sabha</i> has the power to safeguard community resources. Its powers include managing natural resources like land, water, and forest falling within the limits of the village area.</p> <p>However, as mentioned above, for the REDACTED Scheme, valid <i>Gram Sabha</i> approval has not been provided in REDACTED. The Detailed Project Report shows that letters have been obtained from various VWSCs through the elected Panchayat head. The PESA requirement is a resolution from the whole <i>Gram Sabha</i>, i.e. all adult members in a village who are on electoral rolls and not just the VWSC.</p> <p>It is worrying that a World Bank-funded scheme is violating domestic legislation meant for the protection of Indigenous communities and that Bank management has failed to adequately monitor compliance with safeguards and local laws by the borrower.</p>	
20.	<p><i>Violation of the Polluter Pays Principle</i></p> <p>The “polluter pays” principle is a well-accepted general principle of international law and is codified in international instruments. The principle is now also part of Indian environmental jurisprudence. The principle holds that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment.</p> <p>It is well-documented that REDACTED and its</p>	<p><i>This does not pertain to compliance with Bank Policy.</i></p> <p>The issue of alleged environmental degradation in Jamshedpur has no linkage to the Project.</p> <p>The Bank team understands that groundwater contamination in the Project area is naturally-occurring, which may be related to the presence of numerous minerals, but not their extraction processes.</p>

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	<p>surrounding areas have suffered considerable environmental degradation because of industrialisation and intense mining, including uranium mining. The Baseline EA-EMF for Jharkhand acknowledges this environmental degradation, noting that “metallic and dissolved toxic wastes from REDACTED, REDACTED and radioactive wastes from the uranium mill and tailings ponds of the REDACTED and its tributaries.”</p> <p>The Indigenous communities in the region have tried to preserve their water and land resources despite this rapid industrialisation. Yet, the REDACTED Scheme will in effect put the burden on the Indigenous communities, instead of the polluters, by making communities pay for access to drinking water, which is presently free. This is not consistent with the polluter pays principle.</p>	
21.	<p>Prior Attempts to Resolve Problems with the World Bank</p> <p>On behalf of the REDACTED, REDACTED sent a letter to the then World Bank Task Team leader, REDACTED by electronic mail dated REDACTED raising various grievances of the community regarding the REDACTED Scheme. REDACTED forwarded the letter to the current Task Team Leader, Mr. REDACTED.</p> <p>A team of individuals led by REDACTED, REDACTED, visited the REDACTED without notice on REDACTED. The REDACTED shared all the concerns of the community with REDACTED. While acknowledging those concerns, REDACTED told the REDACTED that there is not much that can be done at this stage since construction is almost complete and the REDACTED should try to explain that to the community.</p> <p>In an electronic mail dated REDACTED stated that he had forwarded the community letter to the REDACTED, REDACTED. The management is trying to organise a visit to the communities. However, so far no tangible steps have been taken to solve the issues raised.</p> <p>REDACTED community’s issues regarding the REDACTED Scheme, which concern their autonomy as an Indigenous community, culture, and economic resources, remain unresolved. Despite repeated attempts to reach out to World Bank management, the response has been inadequate. Meanwhile, construction of the ESR continues.</p>	<p>The Bank first became aware of the concerns of some community members regarding the ESR in an email from a Purani Basti resident that was sent to the task team leader on October 10, 2018. The task team leader forwarded this email to the Project Director, Jharkhand, for follow-up by the SPMU and requested the SPMU to share information on the consultation process which took place in the area and any information of relevance to the allegations in the complaint. The team met with the complainant on October 15, 2018, in the Project area, to learn more about his concerns and organized a subsequent visit to meet with a large group of community members and others in and around Purani Basti, South Sarjamda GP, on December 23, 2018.</p> <p>The summary of the points made by the complainant during the October 15 meeting follows:</p> <ul style="list-style-type: none"> • The site is used for the annual Gote Pooja and for bigger events that are celebrated once every 5 years; • The complainant mentioned that among tribal communities, water from the tap is not considered pure, particularly for the bathing of babies on the sixth day after birth. The older people in the village are not keen on water from the tap and prefer to use the water from natural sources; • A forged <i>gram sabha</i> resolution must have been obtained during the absence of traditional leaders who were in Delhi at the time the gram sabha is said to have taken place [<i>note: in fact, it is the team’s conclusion that no gram sabha took place</i>]. • The complainant offered to organize a meeting with other community members including those from the older generation to discuss their concerns in greater detail. <p>In an email to the TTL dated November 12, 2018, the complainant expressed dissatisfaction with the lack of advance notice for the October 15, 2018 visit (which was</p>

No.	Claim	Response
		<p>due to security concerns) and asked for a second meeting. The team proposed a second meeting between November 29 and December 2, 2018. In a follow-up phone conversation on November 29, 2018, it was agreed that the Bank team would visit on December 16, which the complainant later asked to postpone to December 23, 2018.</p> <p>The follow-on meeting took place at Purani Basti habitation on December 23, 2018. At the end of this meeting, although the community members reiterated their demand to remove the ESR, they agreed to think over possible mitigation measures and to discuss them with the DPMU during another round of consultations to be held after the festival season in the first half of January.</p>
22.	<p>Requested Next Steps</p> <p>REDACTED, requests that the Inspection Panel conduct an immediate investigation to confirm the violations of Bank policy described above. The Complainants trust that the Panel process will result in the Bank taking steps to remedy the issues raised in this Request. The Complainants strongly urge the World Bank to:</p> <p>(i) Immediately stop disbursements to the RWSS-LIS and all construction activity on the REDACTED Scheme, until such time that affected communities have been fully informed and consulted about the details of the REDACTED Scheme, including its impacts, remedy, and mitigation measures, and an independent analysis of alternative designs, in which the rights and needs of our community are made the priority. The REDACTED Scheme in its current form is violating World Bank policies, as well as Indian and international law. Therefore, it should not be allowed to proceed further the way it is;</p> <p>(ii) Conduct a comprehensive environmental impact assessment of the REDACTED Scheme, including a social assessment as well as an assessment of the impacts of the REDACTED Scheme on Indigenous populations;</p> <p>(iii) Appoint an independent hydrology expert to look at cumulative hydrological impacts of the REDACTED Scheme, as well as other schemes that have been implemented in REDACTED and surrounding areas under RWSS-LIS;</p> <p>(iv) Once prepared, translate all assessment documents into Hindi and Santhali and disclose them through culturally appropriate consultations with our community, as well as other project affected communities;</p> <p>(v) Allow us, as affected people, to participate in the analysis and decision-making process for possible alternatives. The ESR should be removed, and our REDACTED restored to its original state. If it is</p>	<p><i>Management met with the Requesters and members of the community on December 23, 2018 to better understand their concerns. The interlocutors indicated that they would welcome further discussion after their upcoming festival season in January 2019, and the Bank team will return to South Sarjamda for further consultations at the convenience of the community.</i></p> <p><i>Actions specific to the Second Request for inspection:</i></p> <p><i>In direct response to community concerns:</i></p> <ul style="list-style-type: none"> • By end-February 2019: Management will support the Government of Jharkhand to consult with concerned members of the Purani Basti, South Sarjamda community on the ESR to better understand their concerns and to identify and agree on possible measures to address Project-related impacts. Such measures may include support for the following: <ul style="list-style-type: none"> ○ ensuring that a survey is carried out to identify households in service areas not within reach of a distribution line, and extending the scheme to provide service to households that wish to join it; ○ potentially developing the Romantic Maidan as culturally appropriate, and in consultation with the affected communities including the Requesters; ○ undertaking a discussion with the community and its traditional tribal leaders as to what constitutes an appropriate memorial and exploring re-installation of boulders for the three martyrs or ritually shifting the martyrs' boulders to another sacred site; ○ providing other culturally appropriate benefits to the community. • By end-February 2019: Management will support the State Project Management Unit (SPMU) to review and update existing Information, Education and Communication (IEC) materials (including basic information about the Project and its expected benefits as well as about water, sanitation and hygiene in

No.	Claim	Response
	<p>environmentally feasible, the REDACTED Scheme could be implemented in alternative sites to benefit communities that actually require water, rather than imposing it on our community, which has preserved its water resources despite various challenges;</p> <p>(vi) Conduct all future baseline studies and monitoring reports with full transparency and participation of affected communities and make the results public.</p>	<p>general) to consider existing community concerns, and to finalize preparation of the IEC materials in Santhali and Ho, the most widely spoken tribal languages in this area.</p> <ul style="list-style-type: none"> By end-March 2019: Management will work closely with the SPMU and DPMU to ensure that appropriate consultations on the updated EMP and disclosure are carried out. The update of the EMP will also reflect the feedback from the above-cited detailed consultations with the Purani Basti community. By end-March 2019, Management will complete a review of the processes followed to document community “no objection” to the siting of significant infrastructure (WTPs, ESRs) associated with the two MVSs in Jharkhand. <p><i>To address overall project shortcomings:</i></p> <ul style="list-style-type: none"> By end-March 2019: Management will support the SPMU to disclose the current design of the water schemes and the plan to extend the distribution network to allow coverage of households interested in a water connection in all 21 GPs of the service area. By end-March 2019: Management will hire experts in anthropology and cultural heritage with local experience to assist the Bank team in overseeing the implementation of the Tribal Development Plan (TDP) and Tribal Development Implementation Plan (TDIP) and the social audit that the SPMU and DPMU will be carrying out. By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to hire an agency to support consultation and regular training on environmental and social issues and the TDP. <p>In addition, the following actions included in the Management Response to the First Request for Inspection are also relevant to the remedial actions to address the concerns raised in the Second Request:</p> <p><i>In direct response to community concerns:</i></p> <ul style="list-style-type: none"> By end-February 2019: Management will support the Government of Jharkhand to undertake implementation stage consultations in all GPs covered by the Bagbera and Chhotagovindpur MVSs to update community members on implementation progress. This will allow further scheme information to be provided; clarify aspects related to environmental and tribal development management; as well as provide information on the start of service delivery, and financial aspects related to community contribution

No.	Claim	Response
		<p>and water tariffs, in addition to responding to people's queries.</p> <ul style="list-style-type: none"> • By end-February 2019: Management will complete a review of the revised draft updated EMPs for the Chhotagovindpur and Bagbera MVSSs, which the DPMU has committed to submit to the Bank for review by end-January 2019. • By end-March 2019: Management will request the DPMU to share the results of the water analysis at the water intake with the community and make them publicly available as part of the EMP. <p><i>To address overall project shortcomings:</i></p> <ul style="list-style-type: none"> • By end-February 2019: Management will ensure that executive summaries of safeguard documents are translated and disclosed in Hindi, the predominantly read language in the Project areas, on the relevant department website, at the head office of each GP and at the offices of the contractor. • By end-January 2019: Management will follow up with the SPMU and DPMU to ensure completion of the review of the scope of works and training of the 400 Community Organizers (CO) that have been placed in all five districts of Jharkhand since May 2018, to give them a greater role in disseminating information about the Project, relaying community concerns, and in environmental and social monitoring. This review will also cover Project and site-level GRMs and identify steps to strengthen them. • By end-February 2019: Management and PMUs will complete the ongoing comprehensive review of safeguard compliance of the Category 2 schemes supported by the Project, which includes all of the MVSSs in addition to some SVSSs, and will prepare an action plan for time-bound implementation of any remedial measures that may be required. Priority is being given to completing the reviews of the safeguard documentation for the Chhotagovindpur and Bagbera MVSSs, including the EMPs, and any remedial action pertaining to these MVSSs will need to be addressed before the MVS starts operation. • By end-March 2019: Management will follow up with the Project Management Units at the national, state and district level (NPMU/SPMU/DPMU) to ensure adequate staffing and staff capacity strengthening for appropriate monitoring of EMP implementation and application of safeguards instruments. • By end-March 2019: completion of Project restructuring, which will include the application of OP 4.11 among other aspects.

Annex 2: Maps and Schematics of the Chhotagovindpur MVS, and Pre-Construction Pictures

Figure 1: Schematic of the Chhotagovindpur MVS

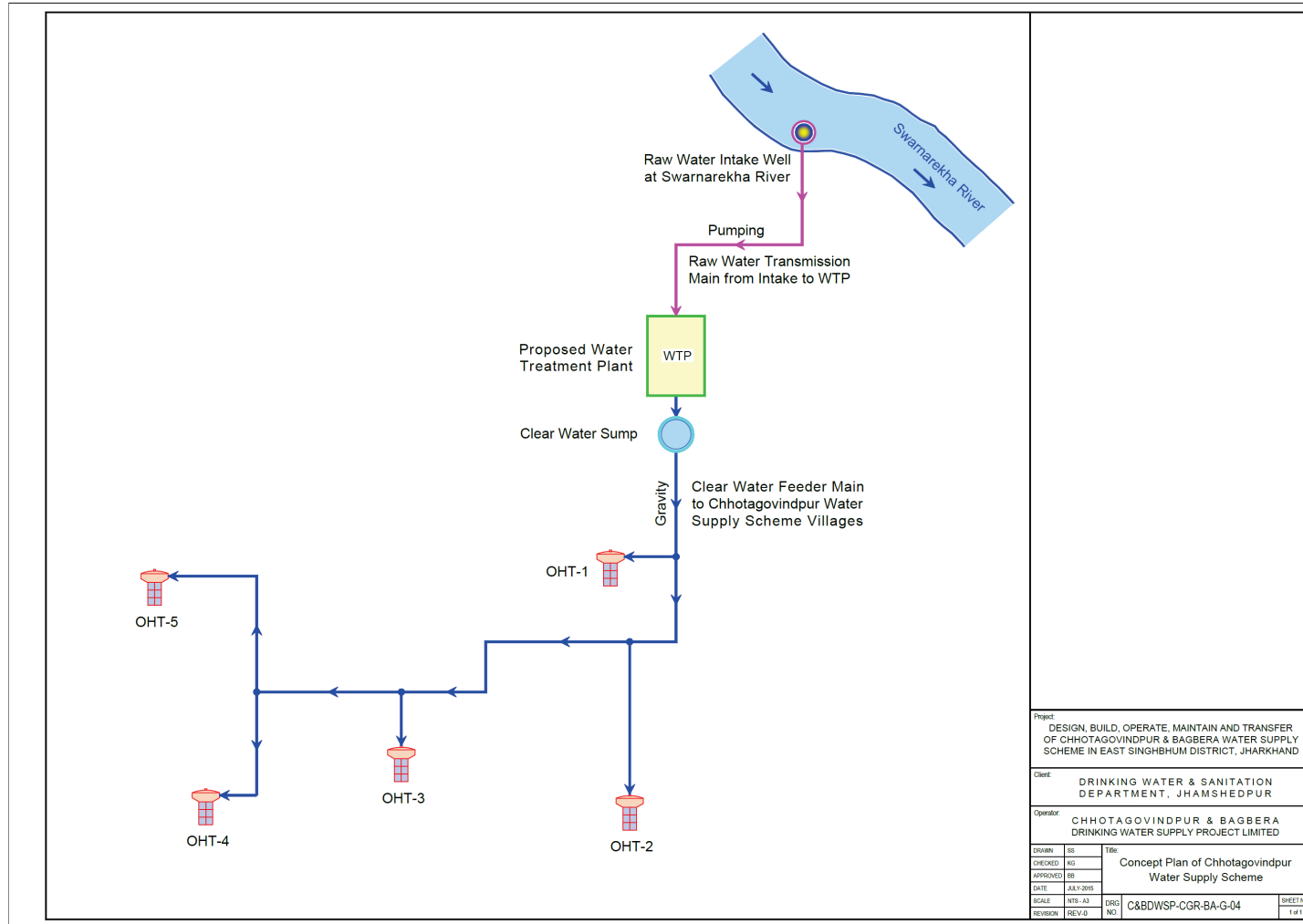




Figure 3: Situational Map of the Chhotagovindpur MVS and the Neighboring Bagbera MVS

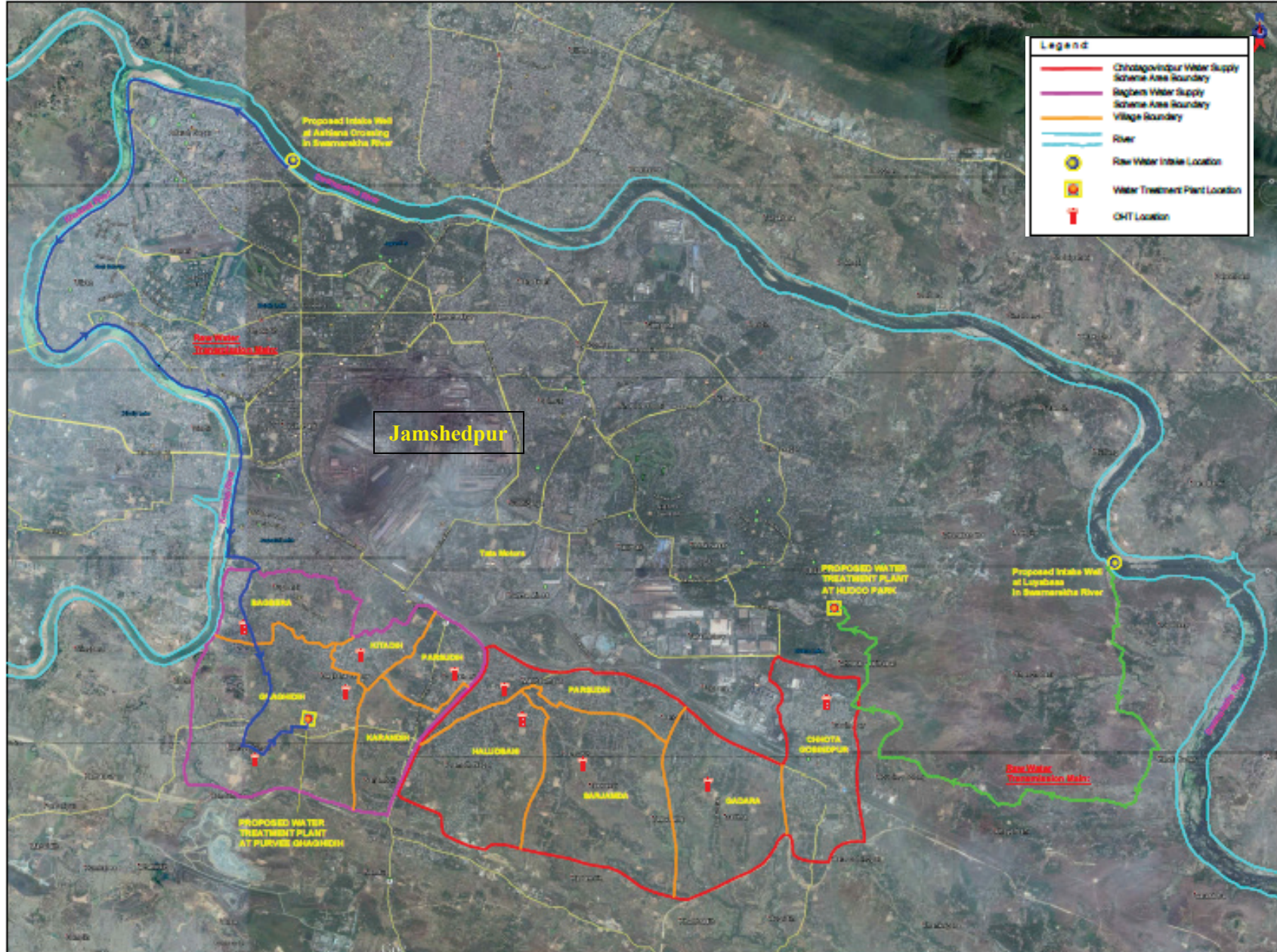


Figure 4: Chronological Historical Google Earth Satellites Images of the ESR Sarjamda Construction Site

April 6, 2013



January 1, 2015

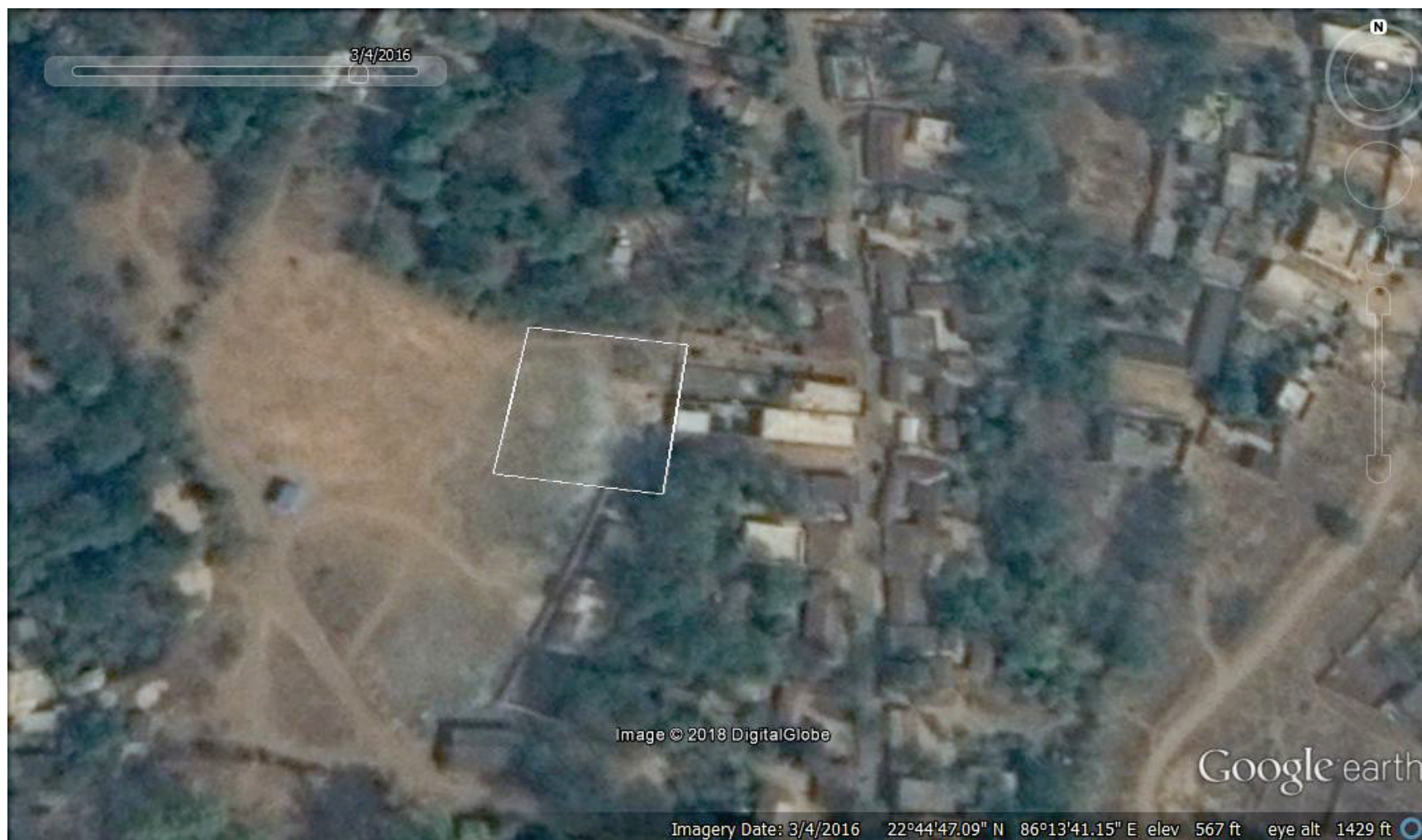


India

December 30, 2015



March 4, 2016



India

January 13, 2017



November 14, 2017

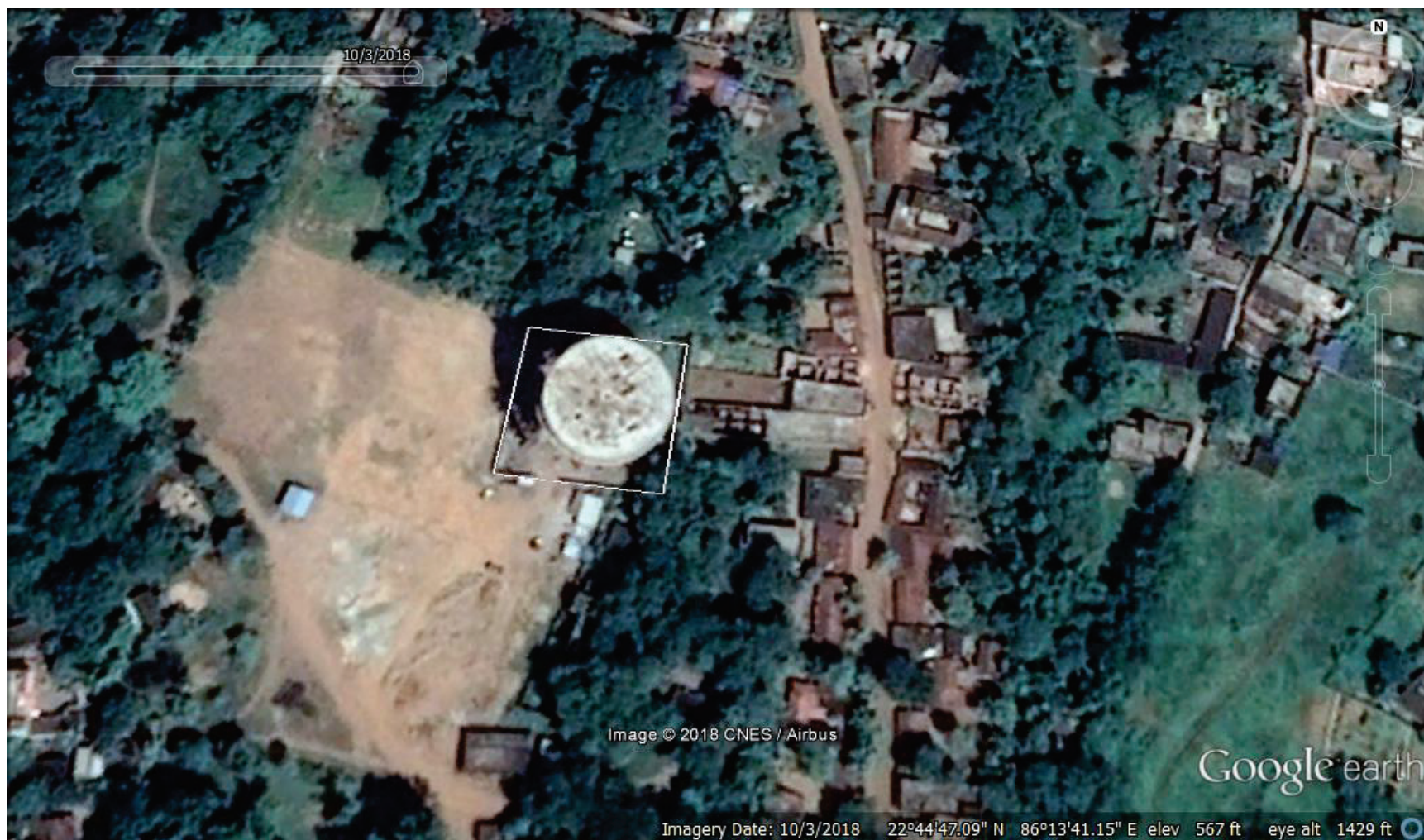


India

February 28th, 2018



October 3, 2018



India

Figure 5: Pictures of the Site Where the ESR Sarjamda Was Later Constructed

April 14, 2015



February 2, 2016



India

March 11, 2016

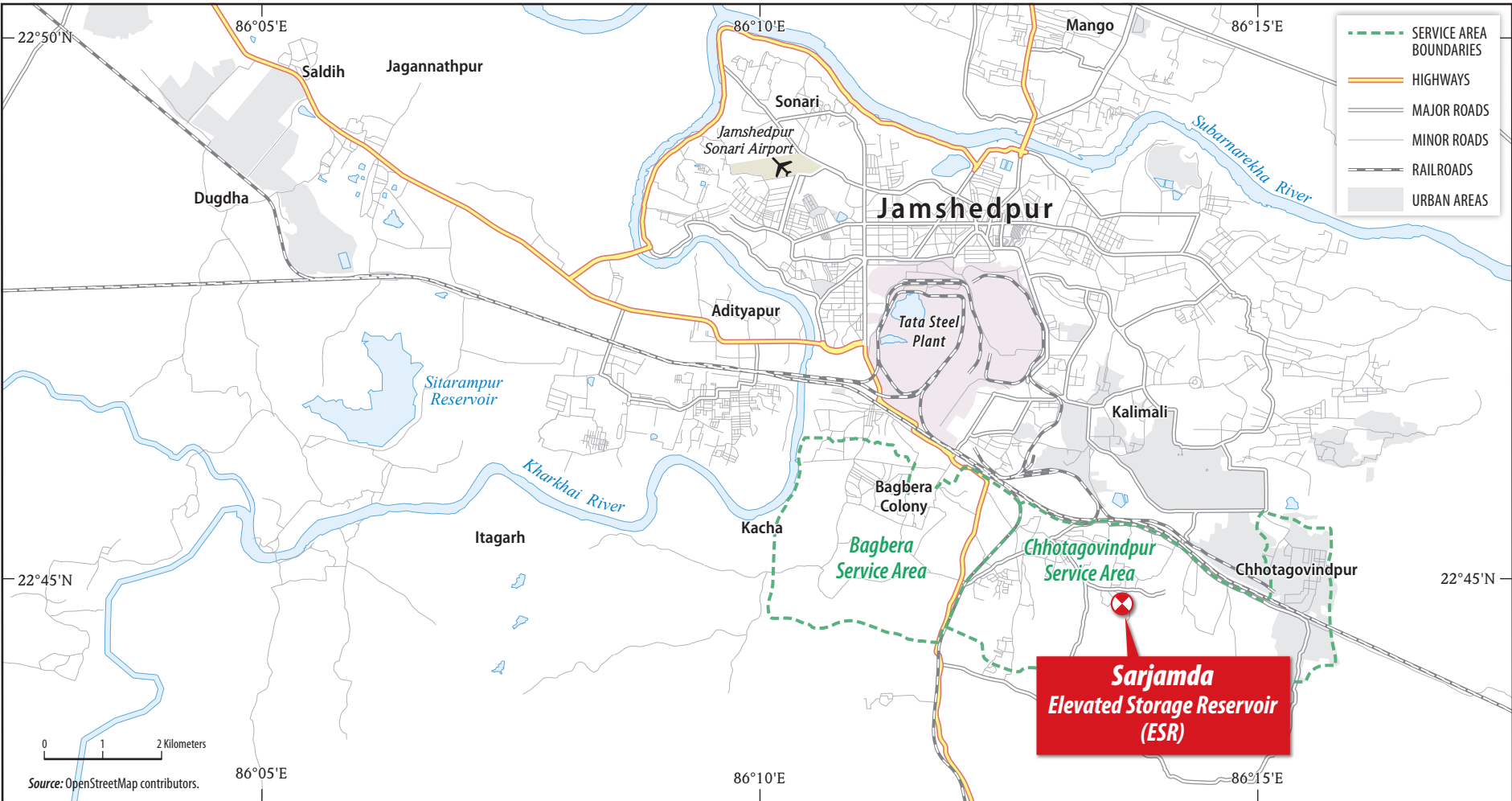


April 12, 2016



INDIA
RURAL WATER SUPPLY AND SANITATION PROJECT FOR LOW INCOME STATES
Request for Inspection

WORLD BANK GROUP
IBRD 44163 | JANUARY 2019
This map was produced by the Cartography Unit of the World Bank Group. The boundaries, colors, denominations and any other information shown on this map do not imply, on the part of the World Bank Group, any judgment on the legal status of any territory, or any endorsement or acceptance of such boundaries.



Annex 3: Consultations and events held at or near ESR Sarjamda site

The annex as provided to the Inspection Panel and the Board contained pages with photographs from the following events:

- February 8th, 2016: Sarjamda ESR foundation ceremony
- March 11, 2016: Groundbreaking Ceremony at ESR Sarjamda site
- April 12, 2016: District Collector and Circle Officer visit the site where the ESR was later built
- May 1, 2016: Aam Sabha at the Site near the site where the ESR was later built

The publicly available annex has been redacted to protect the privacy of the individuals shown in the photographs.

- October 27 to November 10, 2016: Construction of the boundary wall of the ESR in Sarjamda

Source: Contractor: 7 pictures are available at this [link](#)



October 27, 2016



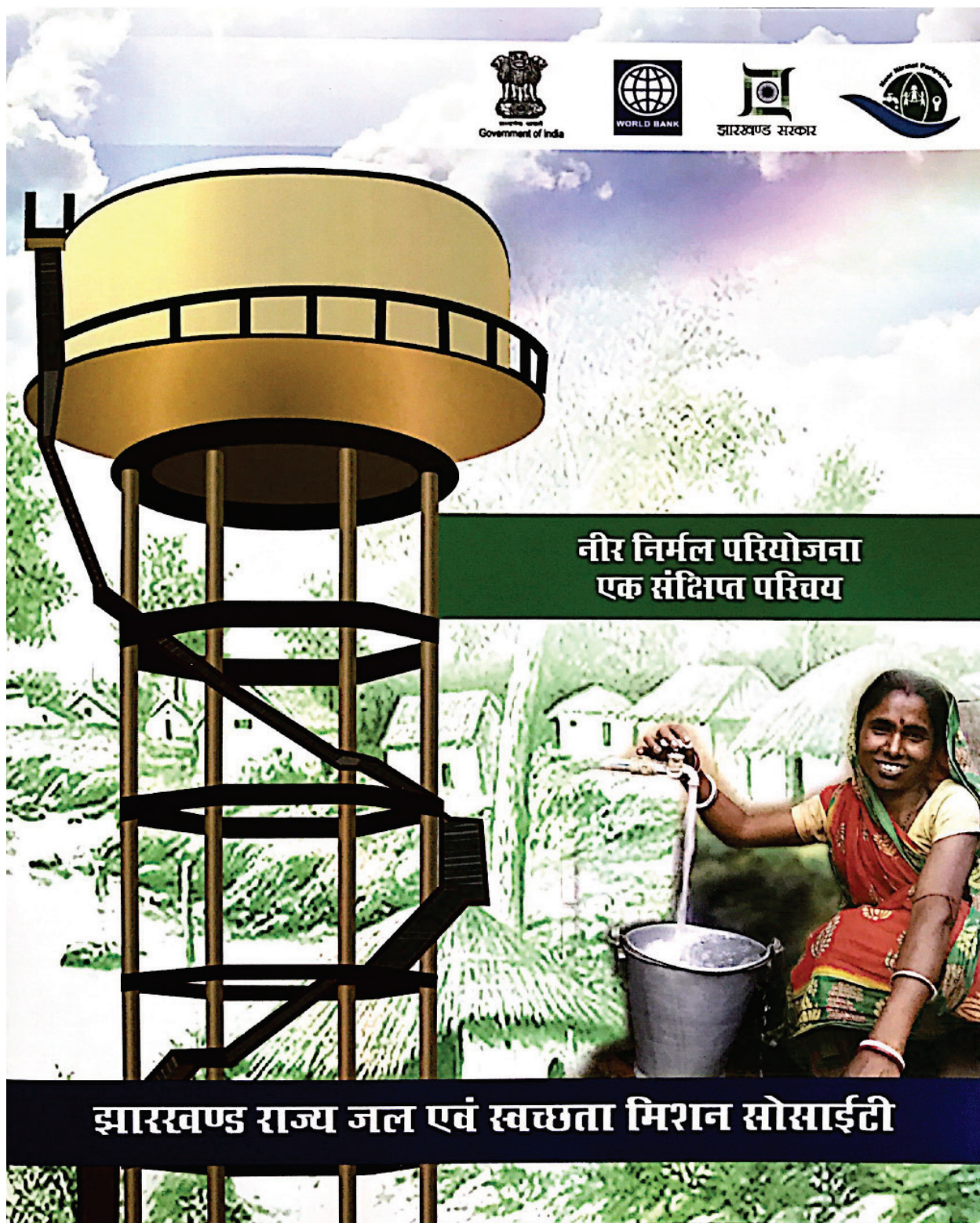
November 5, 2016



November 9, 2016

Communication leaflets (FAQs) and Brochures, often seen in pictures and videos

Brochure: 200 to 250 at State level



नीर निर्मल परियोजना - एक संक्षिप्त परिचय

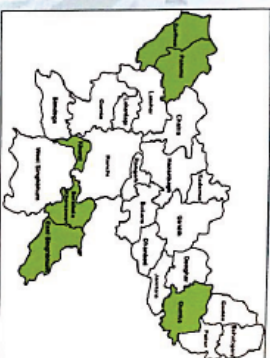
विश्व बैंक एवं भारत सरकार के वित्तीय एवं तकनीकी सहयोग से "ग्रामीण जलापूर्ति एवं स्वच्छता परियोजना" राष्ट्रीय ग्रामीण पेयजल कार्यक्रम एवं 'स्वच्छ भारत मिशन (ग्रामीण)' के अंतर्गत संचालित तथा झारखण्ड सरकार के पेयजल एवं स्वच्छता विभाग के अधीन क्रियान्वित है। यह परियोजना "नीर निर्मल परियोजना" के नाम से जाना जाता है। परियोजना की कुल अवधि 6 वर्षों (अप्रैल 2014 से मार्च 2020) की है।

परियोजना के उद्देश्य

नीर निर्मल परियोजना (ग्रामीण जलापूर्ति एवं स्वच्छता परियोजना) का उद्देश्य 'विकेन्द्रीकृत वितरण प्रणाली के माध्यम से वसूलीत ग्रामीण समुदायों में पाईप द्वारा शुद्ध जलापूर्ति एवं स्वच्छता सेवाएं उपलब्ध कराना है।'

परियोजना से आच्छादित

- परियोजनांतर्गत जिला - 6 जिला (दुमका, पूर्वी सिंहभूम, खूंटी, सरायकेला - खरसावा, गढ़वा, पलामू)।
- ग्राम पंचायत - 530
- वस्तिवर्ग - 3304 (Approx)
- जनसंख्या - लगभग 11 लाख
- अनुसूचित जनजाति - लगभग 4 लाख
- कुल जलापूर्ति योजना - 751 लघु एवं बृहद योजनाएं।
- कुल लागत - 900 करोड़



घटकवार परियोजना आंश

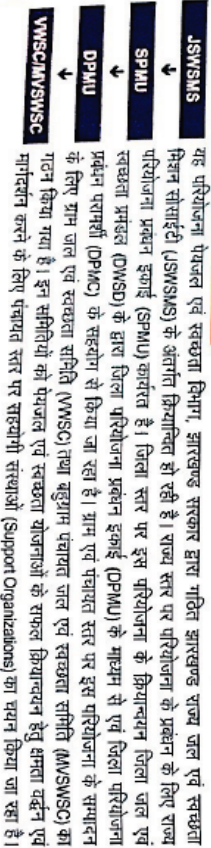
परियोजना के घटक	लागत रु. (करोड़ों में)	कुल प्रतिशत
क्षमता वर्धन एवं संस्थागत विकास	99	11%
द्वैयागत विकास	750	83%
परियोजना प्रबंधन	51	6%
कुल योग	900	100%

परियोजना का सिद्धांत

नीर निर्मल परियोजना के उद्देश्यों की प्राप्ति के लिए निम्नलिखित सिद्धांतों को मुख्य आधार बनाया गया है।

- जलापूर्ति एवं स्वच्छता हेतु समेकित अवधारणा
 - परियोजना लागत तथा संचालन व रखरखाव में सामुदायिक अंशदान
- विकेन्द्रीकरण माध्यम से योजनाओं का क्रियान्वयन
 - संचालन एवं जलवर्धन का विकेन्द्रीकरण
- सार्वजनिक निजी भागीदारी
 - विश्व बैंक सहायित अन्य पेयजल एवं स्वच्छता परियोजना क्रियान्वित राज्यों के साथ दिवनिग
- मौल अद्यतित आपूर्ति
- खिलेवार अवधारणा

परियोजना क्रियान्वयन की संरचना



परियोजना अंतर्गत जलापूर्ति योजनाओं का प्रकार:

छ: वर्ग के परियोजना अवधि में झारखण्ड में कुल 751 लघु एवं बृहद - नई एवं जीर्णोद्धार जलापूर्ति योजनाओं का क्रियान्वयन किया जाना है।

निम्नलिखित प्रकार की योजनाएं

- एकल बसावट / टोला योजना:- गाँव के किसी व्यक्ति बसावट / टोला में पाईप लाईन द्वारा घर-घर पेयजल आपूर्ति हेतु योजना।
- एकल ग्राम पंचायत योजना:- किसी पंचायत के वसूलीत एक से ज्यादा बसावट / टोला, गाँव में पाईप लाईन द्वारा घर-घर पेयजल आपूर्ति हेतु योजना।
- लघु बहुग्रामीण योजना:- 2 से 3 पंचायत के किसी व्यक्ति बसावट / टोला, गाँव में पाईप लाईन द्वारा घर-घर पेयजल आपूर्ति हेतु योजना।
- बृहद बहुग्रामीण योजना:- 3 पंचायत से अधिक किसी व्यक्ति बसावट / टोला, गाँव में पाईप लाईन द्वारा घर-घर पेयजल आपूर्ति हेतु योजना।

जिलावार परियोजना अवधि में कुल जलापूर्ति योजनाओं का विवरण

जलापूर्ति योजनाओं के प्रकार	खूंटी	गढ़वा	पूर्वी सिंहभूम	पलामू	सरायकेला	दुमका	कुल
क. नई योजनाएं							
एकल बसावट योजना / एकल ग्राम पंचायत योजना	80	219	127	0	90	141	657
लघु एवं बृहद बहुग्रामीण योजना	19	3	3	2	12	28	67
क. पुरानी जलापूर्ति योजनाओं का जीर्णोद्धार							
एकल बसावट योजना / एकल ग्राम पंचायत योजना	4	2	2	0	2	12	22
लघु एवं बृहद बहुग्रामीण योजना	0	2	1	0	2	0	5
कुल	103	226	133	02	106	181	751

जिलावार बैंक - 1 जलापूर्ति योजनाओं का विवरण

जलापूर्ति योजनाओं के प्रकार	खूंटी	गढ़वा	पूर्वी सिंहभूम	पलामू	सरायकेला	दुमका	कुल
क. नई योजनाएं							
एकल बसावट योजना / एकल ग्राम पंचायत योजना	41	87	64	0	38	96	326
लघु एवं बृहद बहुग्रामीण योजना	2	1	2	1	2	1	9
कुल	43	88	66	1	40	97	235

परियोजना अंतर्गत स्वच्छता संबंधी कार्य

परियोजना अंतर्गत निम्नलिखित स्वच्छता संबंधी कार्य की जाएंगी।

- व्यक्तिगत शौचालय का निर्माण।
- संस्थागत एवं सामुदायिक शौचालय का निर्माण।
- ठोस एवं तरल कचरा का प्रबंधन।
- समुदाय में जागरूकता लाने हेतु विभिन्न स्तरों पर प्रचार-प्रसार करना (IEC) एवं लोगों में व्यावहारिक परिवर्तन लाना।

आदिवासी विकास क्रियान्वयन योजना

विश्व बैंक की समाजिक सुरक्षा नीति के अन्तर्गत परियोजना अंतर्गत आदिवासी विकास क्रियान्वयन योजना प्रारूप तैयार किया गया है। इस योजना के तहत अनुसूचित जनजातियों एवं आदिम जनजातियों को शामिल करके और उनकी सांस्कृतिक धरोहरों को सुरक्षा करते हुए ऐसे समुदायों एवं उनके परंपरागत संस्थाओं को सशक्त और समावेशी, समान एवं सतत जलापूर्ति और स्वच्छता सुविधा उपलब्ध कराना है।

- VMSC के द्वारा सहयोगी संस्था के सहयोग से रखा जायेगा।
- प्रश्न 21. जलपूर्ति योजनाओं के निर्माण कार्य की अवधि कितनी है?
- उत्तर - एकल नसबंद/एकल ग्राम पंचायत योजना की निर्माण अवधि 6-12 माह है, जबकी लघु बहु ग्राम योजना की निर्माण अवधि 18-24 माह तथा वृहद् बहु ग्राम योजना की निर्माण अवधि 24-36 माह है।
- प्रश्न 22. योजना का निर्माण कौन करेगा?
- उत्तर - योजना का निर्माण VMSC द्वारा चयनित संवेदक के द्वारा की जायेगी।
- प्रश्न 23. इस योजना में एक व्यक्ति को प्रतिदिन कितना पानी मिलेगा?
- उत्तर - इस योजना के अन्तर्गत एक व्यक्ति को प्रतिदिन 70 लीटर पानी मिलेगा।
- प्रश्न 24. योजना के लिए राशि कहाँ से प्राप्त होगी ?
- उत्तर - योजना के लिए राशि आवश्यकतानुसार जिला के पंचायत एवं स्वच्छता प्रमंडल के जिला परियोजना प्रबंधन ईकाई (OPMU) से प्राप्त होगी।
- प्रश्न 25. जलपूर्ति का समय/प्रतिदिन कितने घण्टे के लिए है?
- उत्तर - यह योजना स्तर पर ग्राम जल एवं स्वच्छता समिति (VMSC) द्वारा ग्रामीणों द्वारा तय होगी।
- प्रश्न 26. इस परियोजना में जल जाँच करने की क्या प्रक्रिया है?
- उत्तर - इस परियोजना के तहत जल जाँच FAK तथा जिला एवं राज्य स्तरीय प्रयोगशाला द्वारा की जायेगी।
- प्रश्न 27. अपने जलश्रोत की जाँच कैसे कर सकते हैं?
- उत्तर - अपने जलश्रोत की प्रारंभिक जाँच संबंधित ग्राम पंचायत की जल संहिता, विनई विभाग द्वारा FAK दिया गया है, उनसे कराया सकते हैं।
- प्रश्न 28. योजना के पूर्ण हो जाने पर, कौन योजना का संचालन करेगा?
- उत्तर - योजना के पूर्ण हो जाने पर ग्राम जल एवं स्वच्छता समिति (VMSC) योजना का संचालन करेगी।
- प्रश्न 29. योजना शीटग्रस्त पाते जाने पर कौन इसकी मरम्मत करायेगा?
- उत्तर - योजना के निर्माण के उपरान्त पहले वर्ष में संवेदक द्वारा मरम्मत की जिम्मेवारी स्वी जाएगी और इसके

- उपरांत ग्राम जल एवं स्वच्छता समिति (VMSC) योजना का रख-रखाव करेगी।
- प्रश्न 30. एकल/बहुग्राम योजना के अन्तर्गत पंप ऑपरेटर का चयन कौन करेगा?
- उत्तर - पंप ऑपरेटर सहित अन्य सभी कर्मियों का चयन VMSC के द्वारा होगा। पंप गृहजलमीनार एवं अन्य अवयव जिस किसी के निजी जमीन पर बना हो, उस निजी जमीन के मू-स्वामी के परिवार के किसी एक अधिकृत व्यक्ति को ऑपरेटर के रूप में चयन किया जाएगा।
- प्रश्न 31. ऑपरेटर को भुगतान कौन करेगा ?
- उत्तर - ऑपरेटर एवं अन्य कर्मियों का भुगतान VMSC बहुत किये गये जल के मासिक शुल्क से करेगा।
- प्रश्न 32. विद्युत का निवेशन किस के नाम पर होगा ?
- उत्तर - विद्युत निवेशन VMSC के नाम पर होगा।
- प्रश्न 33. विद्युत निवेशन के बिल का भुगतान कौन करेगा?
- उत्तर - विद्युत निवेशन के बिल का भुगतान VMSC करेगा।
- प्रश्न 34. एक गा. अधिक ग्राम पंचायतों को आच्छादित करने वाली योजना किस समिति द्वारा संचालित होगा ?
- उत्तर - ऐसी योजना बहु ग्राम जल एवं स्वच्छता समिति के द्वारा संचालित होगी।
- प्रश्न 35. बहु ग्राम जल एवं स्वच्छता समिति के मुख्य परामर्श कौन होते हैं ?
- उत्तर - सबसे अधिक आच्छादित (जल संयोजन) ग्राम पंचायतों के मुखिया अध्यक्ष, दूसरे अधिक आच्छादित ग्राम पंचायत के मुखिया/उपमुखिया समिति के सचिव, अध्यक्ष द्वारा मननीय जल संहिता समिति की संयोजक सह-कोषाध्यक्ष होती है।
- प्रश्न 36. बहु ग्राम जल एवं स्वच्छता समिति के बैंक खाता का परिचालन कितने द्वारा किया जाता है ?
- उत्तर - इस बैंक खाते का संचालन समिति के अध्यक्ष, सचिव या कोषाध्यक्ष में से किन्हीं दो के हस्ताक्षर से होता है।
- प्रश्न 37. क्या इस परियोजना अन्तर्गत पेयजल एवं स्वच्छता सम्बंधित कोई सर्वेक्षण होगा ?
- उत्तर - हाँ, इस परियोजना अन्तर्गत पर-पर सर्वेक्षण सहित गाँव एवं पंचायत स्तर पर सर्वेक्षण होगा।





प्रश्नोत्तरी




झारखण्ड राज्य जल एवं स्वच्छता मिशन सोसाईटी

श्री निर्मल परियोजना

(ग्रामीण जलपूर्ति एवं स्वच्छता परियोजना)

राज्य परियोजना प्रबंधन ईकाई

पंचायत एवं स्वच्छता विभाग

झारखण्ड सरकार, राँची

चौधा तल्ला, सिटाडेल टावर,

मेन रोड, राँची - 834 001 (झारखण्ड)

दूरभाष : 0651-2330334

प्रश्न 1. ग्रामीण जनतापूर्ति एवं स्वच्छता परियोजना क्या है?

उत्तर - यह परियोजना विश्व बैंक एवं भारत सरकार के

पेयजल कार्यक्रम' एवं 'स्वच्छ पाताल मिशन' के अंतर्गत संचालित तथा झाराखण्ड सरकार पेयजल एवं स्वच्छता विभाग के द्वारा क्रियात्मित की जा रही है। इस परियोजना को 'गीर निर्मल परियोजना' के नाम से भी जाना जाता है।

प्रश्न 2. यह परियोजना झारखण्ड के किन जिलों में क्रियान्वित होगी?

वरा - यह परिगणना श्रावण षष्ठ के दुमका, पूर्वी सिंहमू, बूँटी, सायकला-खरासावां, गढ़वा एवं पलामू जिलों में क्रियाचित होगी।

प्रश्न ३. इस परियोजना में कुल कितनी जलापूर्ति योजनाएं हैं?

उत्तर - इस परियोजना में 751 लघु एवं बृहद् जलाशयों की योजनाएँ हैं।

प्रश्न 4. इस परियोजना अन्तर्गत स्वच्छता सम्बन्धित कौन-कौन से कार्य होंगे?

उत्तर

मह. परिशोधना में योजना एवं स्वच्छता के समीकित अवधारणा पर कीन्द्रित है। इस परिशोधना के तहत शोध पर-पर शोधालय निर्माण, संस्थागत शोधालय निर्माण तथा ठोस कचड़ा प्रबंधन का कार्य स्वच्छता मिशन- ग्रामीण (SBMG) के सहयोग से होगा।

प्रश्न ५.
क्या यह स्वच्छता कार्य सिर्फ जिन दोलों/ गाँवों में
पंचजलापूर्ति योजना है, वहाँ क्रियान्वित होगी?

वतार - नहीं, भले पेयजलपूर्ति परियोजना सिर्फ एक टोलेगाँव के लिए हो, पर स्वच्छता का कार्य पूरे ग्राम पंचायत में क्रियान्वित होगी।

प्रश्न 6. इस परियोजना अन्तर्गत आदिवासी विकास योजना क्या है ?

उत्तर - इस पर्यायजन्य अन्तर्गत आदिवासी विकास र्थी एक विशेष प्रारूप तैयार किया गया है जिसके तहत आदिवासियों एवं अल्पजनातिथियों को सशक्तिकृत करने के लिए एक सुनिश्चित करारा जागरूक। उनको पढवान, गरिमामय एवं संस्कृतित व धार्मिक धरोहर को सुरक्षित रखकर हुए उनके परम्परागत संस्थाओं को सशक्त करार कर हुए सतत जतागूत एवं स्वच्छता सुविधा उत्तरजन्य

करायी जाएगी।

प्रश्न 7. पार्यायोजना अन्तर्गत कितने आदिवासी एवं आदिम जाति के लोग लाभान्वित होंगे ?

उत्तर - इस परियोजना से आदिवासी एवं आदिम जाति समुदाय के लगभग 4 लाख लोग लाभान्वित होंगे।

प्रश्न 8. ग्राम स्तर पर इस परियोजना का क्रियान्वयन किनके द्वारा किया जाएगा ?

उत्तर - ग्राम स्तर पर गठित ग्राम जल एवं स्वच्छता समिति के द्वारा इस परिवोजना का क्रियाव्ययन किया जाएगा।

प्रश्न 9. ग्राम जल एवं स्वच्छता समिति में किताने सदस्य होते हैं?

उत्तर - ग्राम जल एवं स्वच्छता समिति में 9 से 12 सदस्य होते हैं।

प्रश्न 10. ग्राम जल एवं स्वच्छता समिति की कोषाध्यक्ष कौन होती है ?

उत्तर - जल सहिया ग्राम जल एवं स्वच्छता समिति की कोषाध्यक्ष होती है ।

प्रश्न 11. जल संहिया को कितने वेतन का प्रावधान है ?

शौचालय निर्माण, शौचालय इस्तेमाल और रख-रखाव

राशि देने का प्रावधान है ।

हेतु लाभाभिचित् परिचारां का प्र-प्र पाईय क
कनेक्षण लेने के लिए कितनी राशि एकमुश्त जम
करना होगा ?

वृत्तर - ग्राम स्तर पर इस परियोजना के अंतर्गत जलापूर्ति हेतु लाभाञ्जित परिवर्गों को छा-छर पाईप के

कनेशन लेने के लिए किसी भी तरह की गारि नही देय होगी, परन्तु सामुदायिक अंशदान स्वचक्र प्रति घर कुल 450 रु (सामान्य जाति के लिए) एवं 225 रु (अनुसूचित जाति एवं जनजाति के लिए) एकमजबूत जमा कराया होगा।

प्रश्न 13. इस परियोजना अन्तर्गत सामुदायिक अंशदान क
राशि किसके पास जमा करनी है ?

वर्तत - इस परिचोजना अन्तर्गत सामुदायिक अंशदान के यशिश ग्राम जल एवं स्वच्छता समिति की कोषाध्यक्षता जल संहिता की पास बना करती है जो इस यशिश को ग्राम जल एवं स्वच्छता समिति के बैंक खाना में

जमा करेगी।

प्रश्न 14. बक खाता किसके नाम से खोला जायेगा?

उत्तर - बैंक खाता ग्राम जल एवं स्वच्छता समिति (ग्रामीण जलापूर्ति एवं स्वच्छता परिषोजना)

प्रश्न 15. बैंक खाता में कौन-कौन प्रद्वारी रहेंगे?

उत्तर - बैंक खाता में मुखिया, अध्यक्ष, उप मुखिया/वाहा

सदस्य, उपाध्यक्ष और जलसाहिवा को प्राध्यक्ष होंगे
जमा एवं निकाली किन्हीं दो परधारीयों के इलाका
से होगा।

प्रश्न 16. सामुदायिक अश्वान का छडकर लामुका का आ किस प्रकार की राशि देय होगी?

उत्तर - सामुदायिक अंशदान को छोड़कर लाभकों को प्री

पर प्रतिपादित है— 50-70 के बीच में (ग्रामीणी) व
द्वारा तय की गयी) राशि देय होगी जो ग्राम जल ए.एस.
स्वच्छता समिति के बैंक खाते में जमा होगी। या
राशि योजना के संचालन एवं रख-रखाव में खर्च
होगी।

प्रश्न 17. जलापूत से संबंधित शिकायतों का निवारण कैसे किया जाएगा ?

उत्तर - जलापूर्ति से संबंधित शिकायतों को जल सहिष्णु के

द्वारा VWSC से प्रमाणित रिकार्ड पर पंजी में और केवल
किया जाएगा और अधिकतम तीन कार्य दिवसों में
अंदर VWSC के द्वारा उम्मीद रिजल्टों में
निराकरण किया जाएगा।

प्रश्न 18. पाइप जलानुसार या जलानुसार कौन करेगा ?

उदा - पार्थिव जलापूर्ति योजनाओं के निहितार्थों का विश्लेषण
संशोधित WMSO के द्वारा प्रदान किया गया है।
विभाग तथा सहयोगी संस्था के द्वारा से किया
जायेगा।

प्रश्न 19. पादप जलाशुष्य की विशेषता क्या है ?
सामग्रियों का इस्तेमाल करें

उत्तर -

पार्थिव जलानुर्द्धि भोजनार्थी के एक छात्र थे। वे अपने सामग्रीयों का कचरा सँवहना उनका ही धर्म समझते थे।
जब वे पढ़ाई से लौटते हैं तो उनके घर में सब कुछ तैयार होता है।

प्रश्न 20. क्रय की माँग नीचे दी गई है। यह माँग किस प्रकार की होगी?

वृत्तर - क्रय की गई सामग्रियों का राशि-वृत्त, भाषा,

Timeline related to Request for Inspection of the Chhotagovindpur MVS

Date	Description
7-Nov-12	Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS) PCN stage - Final Version disclosed
April 17-30, 2013	Appraisal Mission
Nov 18-19, 2013	Negotiations
30-Dec-13	Board Approval
Start of Project supervision	
8-Feb-14	Signing
8-May-14	Effectiveness
June 2-25, 2014	First Implementation Support Mission and Project Launch Mission.
Oct 27 - Nov 25, 2014	Second Implementation Support Mission.
April 6 - May 7, 2015	Third Implementation Support Mission. Orientation workshops on Project policies and processes.
25-May-15	Signature of DBOT contract for the Chhotagovindpur and Bagbera MVSeS
23-Jul-15	The contractor submitted a draft scheme-specific EMP to the DPMU for approval
17-Aug-15	letter from the contractor to the Executive Engineer (EE) referred to people in Purani Basti objecting to the ESR out of concern that it would reduce the area of the football playing area
31-Oct-15	letter from the EE to the Sub-Division Officer, Jamshedpur, indicated that authorities were aware of resistance to the ESR at the scheme site and mentioned Sarjamda along with other locations
Nov 1-4, 2015	Environment Spec. field visits to Chhotagobindpur - Baghbera MVSeS and progress review
Nov 1-6, 2015	Technical mission on social development issues including to East Singhbhum District
Nov 16-30, 2015	Fourth Implementation Support Mission. Team visited MVSeS in Jharkhand, had extensive interactions with contractor and visited selected sites.
8-Feb-16	Foundation Ceremony at Sarjamda ESR site
11-Mar-16	Groundbreaking ceremony at Sarjamda ESR site
4-Apr-16	Meeting in South Sarjamda Panchayat building. Minutes, signed by 38, refer to the Project and VWSC role.
17-Apr-16	Meeting in North Sarjamda Panchayat building with representatives of South, North and Middle Sarjamda. The meeting, attended by 100+, refer to ESR construction, related issues raised and discussions to solve 'the issue of water'.
1-May-16	Aam Sabha to discuss opposition to ESR construction in Sarjamda, Project related issues and benefits from the water scheme
May 3-7, 2016	Social Safeguards Thematic Review aiming at informing MTR mission. Consultant visits Chhotagovindpur - Baghbera MVS scheme. Meetings with communities and Contractors' representatives. SPMU social specialist and DPMU social experts participated. Main points: Social management actions, delayed, need to be carried out and need to keep up with the project implementation timeframe.
Jul 25- Aug 5, 2016	Fifth Implementation Support and MTR Mission

Aug-16	Social Safeguards Thematic Review report issued by Bank consultant.
27-Oct-16	ESR construction works starts with first boundary wall construction
10-Nov-16	ESR boundary wall completed
Feb. 6-17, 2017	Sixth Implementation Support Mission
July 17-August 3, 2017	Seventh Implementation Support Mission
5-Oct-17	District authorities formally approve EMP
Nov 19-21, 2017	Bank team including Social safeguards team visits Chhotagobindpur Baghbera MVS, including site visit to WTP site, Giddih Jhopri and Ranidih
January 4-22, 2018	Eigh Implementation Support Mission
October 8-31, 2018	Ninth Implementation Support Mission (ML and AM under Preparation)
10-Oct-18	Email Complaint received by Bank
12-Oct-18	<i>TTL forward complaint to GRS</i>
12-Oct-18	TTL forward the complaint to Project Director, Jharkhand, asking the SPMU to share land status, permission or voluntary donation as the case may be, the consultation process which took place in that area, and any knowledge or information w.r.t the allegations in the complaint letter.
15-Oct-18	Bank team (Lead Social Specialist, Social Development Specialist and Senior Communications Officer) meets Complainant in Purani Basti (literally 'Old Habitation') of South Sarjamda GP; two other members of the community join the discussions. (No advance notice was provided to Complainant about Bank team visit due to Security considerations)
29-Oct-18	TTL replies to complainant that complaint was shared with SPMU and DPMU and team will revert soon
12-Nov-18	Email from complainant to TTL complaining about lack of advance notice of Bank visit and asking for a fresh interaction with advance notice to allow larger village community to attend
12-Nov-18	<i>TTL forwards to GRS seeking guidance on how best to respond in light of the first IP request related to the neighboring Bagbera MVS</i>
19-Nov-18	<i>TTL send a reminder to GRS on pending request for guidance</i>
22-Nov-18	TTL replies to complainant apologizing for lack of advance notice on earlier visit and proposing a second meeting between November 29 to 2 December 2018
27-Nov-18	TTL sends reminder email to complainant on meeting dates proposed
28-Nov-18	Complainant replies to TTL indicating agreement for a phone conversation on Nov 29
29-Nov-18	Phone conversation with Complainant; Complainant repeats request for a meeting with entire community of Purani Basti; agreement for a Bank visit on December 16
30-Nov-18	TTL sends email confirmation of visit to Purani Basti to meet Complainant and village assembly on Sunday, Dec. 16th
2-Dec-18	Complainant emails TTL to request postponing the Bank visit to December 23 rd or any Sunday thereafter
13-Dec-18	TTL confirms by email to complainant the revised visit date of Dec. 23 rd

13-Dec-18	The contractor submitted separated EMPs for the Chhotagovindpur MVS and the Bagbera MVS to the DPMU; SPMU emails the EMPs to the Bank for review.
17-Dec-18	Team member calls Complainant to request confirmation of proposed visit; leaves message with the person who answered the phone as Complainant was not at home.
18-Dec-18	Team member talks to Complainant on the phone in hope to confirm proposed visit on Sunday December 23. However, the Complainant indicated that December 23 would not suit due to heavy rains in Jamshedpur and that he would propose an alternate date by email.
20-Dec-18	TTL emails Bank comments on EMPs of the Chhotagovindpur and Bagbera MVSs
20-Dec-18	Complainant emails TTL to confirm the visit date of December 23 rd
23-Dec-18	Bank team (Co-TTL, Lead Social Specialist, Senior Environmental Specialist, Senior Communications Officer, Social Development Specialist) meets Complainant and members of the community in Purani Basti of South Sarjamda GP
25-Jan-19	TTL emails complainant requesting a date for a phone conversation to follow up on request for further discussion after the January festival season and to discuss possible dates for the task team to return to South Sarjamda for further consultations at the convenience of the community.