Safeguards Due Diligence Report

Project Number: 42267-026
June 2020

IND: Rajasthan Urban Sector Development Program
Package: Faecal Sludge Management Solutions for Khandela, Distt. Sikar, Rajasthan

Submitted by: Rajasthan Urban Infrastructure Development Project, Jaipur

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Asian Development Bank
Dear,


Thanks

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K.M. Mandawaria
SE (R&B) and PO (Social & Coord.)
RUIDP

Received 6.05.20
SFG Log: 4126
IND: Rajasthan Urban Sector Development Program

Package: Faecal Sludge Management Solutions for Khandela, Distt. Sikar, Rajasthan

ABBREVIATIONS

ADB – Asian Development Bank
AF - Anaerobic Filter
AP - Affected Person
BMGF – Bill and Milinda Gates Foundation
CAPC – Community Awareness and Participation Consultant
CLC – City Level Committee
CWR – Clear Water Reservoir
DEWATS - Decentralized Waste Water Treatment System
DBO – Design, Build and Operate
DDR – Due Diligence Report
DPR – Detailed Project Report
EC - Empowered Committee
EAC – Expert Appraisal Committee
FGD – Focus Group Discussions
FSSM – Faecal Sludge and Septage Management
FSTP – Faecal Sludge Treatment Plant
GOI – Government of India
GOR – Government of Rajasthan
GRM – Grievance Redress Mechanism
KLD - Kilo litres/day
LSGD – Local Self Government Department
LPCD – Liters per Capita per Day
MLD – Million Liters per Day
NOC – No Objection Certificate
O&M – Operation and Maintenance
OHSR – Over Head Service Reservoir
PDBs - Planted Drying Beds
PIU – Project Implementation Unit
PMU – Project Management Unit
ROW – right-of-way
RUIDP – Rajasthan Urban Infrastructure Development Project
RUSDP - Rajasthan Urban Sector Development Program
SDP - Sector Development Program
SIP – Service Improvement Plan
SPS – Safeguard Policy Statement, 2009
STP – Sewerage Treatment Plant
ULB – Urban Local Body
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I. INTRODUCTION

A. Project Overview

1. The Rajasthan Urban Sector Development Program (RUSDP) will complement the past and ongoing efforts of the Government of Rajasthan (GOR) to improve water supply and wastewater services to the residents of the state of Rajasthan. The program component of the RUSDP will support policy reforms and consolidate institutional development and governance improvement in the urban sector in the state, while the investment component of the RUSDP will invest in water distribution network improvements and sewerage systems in the six project cities\(^1\) each having a population of more than 100,000 and identified considering the lack of basic services at present and willingness to undertake reforms and institutional restructuring. RUSDP will be implemented over a five-year period beginning in March 2015 and will be funded by the Asian Development Bank (ADB) via a sector development program (SDP) loan modality.

2. RUSDP Phase - 3 program was conceived to include a grant component contributed by Bill and Melinda Gates Foundation (BMGF) through the Rajasthan Urban Infrastructure Development Project’s (RUIDP) existing framework to address the issue of decentralized wastewater and city-wide Faecal Sludge and Septage Management (FSSM) across the state of Rajasthan. The initial outlay for the grant is US$ 2 million, and the fund will be utilized for conducting pilot studies in various project towns. The project aims to find innovative sanitation solutions, conduct pilot studies in pocket areas that are devoid of the conventional sewerage system, capture information for the replicable model, explore the possibility of engaging private service providers, and develop an institutional framework and capacity building. In the initial stages of the project, the focus was on the six RUIDP project towns (Tonk, Bhilwara, Pali, Hanumangarh, Sri Ganganagar, and Jhunjhunu), along with four additional program loan towns (Jhalawar, Sawai Madhopur, Bikaner, and Kota). Micro-scale pilot studies were conducted in two towns of Tonk and Jhalawar, where identified pockets were in the core city area and left out from conventional sewerage system, which included on-site sanitation solutions at a neighborhood scale.

3. RUIDP proposed to implement a Faecal Sludge Treatment Plant (FSTP) for Khandela town in Rajasthan to assess the current gaps in sanitation across the towns and suggest sustainable and cost-effective ways to manage faecal sludge generated within its boundary.

B. Objectives and Scope of this Report

4. The main objective of due diligence exercise is to confirm that the subproject is free of involuntary resettlement impacts such as land acquisition, physical displacement, economic displacement, adverse impact on livelihood, community properties or any other impacts, based on a review of land records, stakeholder consultations and field visits to subproject locations. This document describes the findings and provides copies of relevant documents, minutes of meetings, and photographs.

5. This due diligence report (DDR) has been prepared by assimilating the details of the detailed project report (DPR), findings from the field visits, and discussions with relevant government officials and information gathered during the public consultation, which is aligned with ADB’s safeguards requirements.

\(^1\) Pali, Tonk, Ganganagar, Jhunjhunu, Bhilwara and Hanumangarh
II. DESCRIPTION OF SUBPROJECT AREA

6. Khandela is an important town in the north part of Rajasthan situated in Sikar District. The town spread in 12 km² is a sub-district headquarter situated on state highway 37. Khandela is 100 km from state capital Jaipur and 52 from its district headquarter Sikar. Khandela is a distinct and old town in the Shekhawati Region. The closest railway station to the town is Shri Madhopur & Palsana Station. The town can be reached by road from Sikar and railways, which connect it to Jaipur. The people are mainly engaged in Business, agricultural and industrial works.

7. Khandela is a town located in the east of district Sikar, 52.5 Km from the Sikar City. In the 2011 India census, Khandela recorded a population of 22,475. Males constituted 11567 (50.9%) of the population and females 10909 (49.1%). Khandela had an average literacy rate of 69.4%, higher than the national average of 59.5%: male literacy was 84.1%, and female literacy was 53.9%. The total working population is 6140 (27.31% of the population), with 5166 main workers and 974 marginal workers.

Figure 1: Map and Location of Khandela town

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2 Main Workers are those workers who had worked for the major part of the reference period i.e. six months or more. The Main workers are classified on the basis of Industrial category of workers into the following four categories (Cultivators, Agricultural Labourers, Household Industry Workers and Other Workers)
III. SUBPROJECT DESCRIPTION

A. Existing Sanitation system in Khandela

8. As per 2011 census, 58.3% of the households (HH’s) have a toilet or access to the toilet within their premises. Apart from that, nine community toilets have been constructed by the Nagar Panchayat. Each would be catering to approximately 200 users. There is one Public toilet in the Market area, and which caters to 0.6% of the population. 41.1% of HH’s were practicing open defecation. Khandela Nagar Palika, with the help of funds from Swachh Bharat Mission (Urban), approved the construction of 935 individual household latrines (Data up to Nov 13, 2017). As of now, Khandela Municipal Board has declared itself Open Defecation Free.

9. The containment systems are mostly septic tanks, with a few single pits. It is estimated that 50% of toilets are connected to septic tanks. The average size of these septic tanks is 8X5.5X6.5 feet, which varies considerably in the available area. There is one Public Toilet and nine Community Toilet with five seats and 86 seats, respectively, in Khandela. All public toilets are owned and constructed by the Nagar Palika and then leased out privately either through Sulabh or any other organisation, who are then responsible for the operation and maintenance.

10. **Disposal methods of Faecal Sludge**: Khandela city is serviced by a desludging vehicle owned by the private operators as well as Government Operators. Private operators serve based on the demand from the local population. The ULB owns a desludging truck but is not in function, and the people mostly depend on private desludging operators who charge anything between Rs 800 -2000.

B. Subproject Components.

11. The details of works carried out in this subproject are summarized in Table 1 below:

<table>
<thead>
<tr>
<th>S. No</th>
<th>Component</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>To provide technological solutions for faecal sludge management and development of a plan for FSSM</td>
<td>One number</td>
</tr>
<tr>
<td>2</td>
<td>Construction of a Faecal Sludge Treatment Plant (FSTP) of 10 KLD(Kilo litres/day) capacity</td>
<td>To provide low cost sanitation services for population in the outskirts and living in scattered habitations</td>
</tr>
<tr>
<td>3</td>
<td>Procurement of Desludging Vehicles.</td>
<td></td>
</tr>
</tbody>
</table>


12. **FSTP concept proposed For Khandela**: This faecal sludge treatment unit is designed for ten cum capacity. The sludge from households of Khandela town would be conveyed six days a week to the treatment unit. The faecal sludge shall first be made to pass through the screening chambers (12 nos) for the retention of course materials/ solid waste present in the faecal sludge. The liquid sludge would be conveyed to Planted Drying Beds (PDBs) 12 nos, where they are allowed to degrade naturally with the help of a specific plant. The planted drying beds are structures with a sloped base for holding graded filter media. The sludge undergoes liquid-solid separation and also drying. The dried sludge from the planted drying beds is removed once in 1 or 2 years depending on the rate of feeding, and the rest of the part, which is the liquid percolate or effluent wastewater is conveyed to the separate treatment units. The effluent wastewater is then treated in two stages (primary and secondary stage) in Decentralized Waste Water
Treatment System (DEWATS) modules. The primary stages i.e. Settler, is mainly meant for sedimentation of any solids that have entered the modules along with the percolate. The secondary stage i.e. Anaerobic Filter (AF) is for the anaerobic degradation of any dissolved and suspended organic matter. The partially treated wastewater from the secondary treatment unit would be conveyed into the horizontal planted gravel filter takes place. The treated wastewater from the planted gravel filter is allowed to soak into the ground through a polishing pond, and it can be reused for agriculture by placing polythene sheet at the bottom of the pond to stop seepage into the ground. In the future, if the quantity of faecal sludge is expected to increase significantly the same system can be replicated in the selected location to accommodate the extra loads. The area available in the selected location for FSTP is five acres. Table 2 presents the details of modules of FSTP along with their required area.

<table>
<thead>
<tr>
<th>S.No</th>
<th>Modules</th>
<th>Nos</th>
<th>Area(Sq.m)</th>
<th>Total Area (Sq.m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Screening Chamber</td>
<td>12</td>
<td>3.4</td>
<td>40.8</td>
</tr>
<tr>
<td>2</td>
<td>Planted Drying Bed</td>
<td>12</td>
<td>68.1</td>
<td>816.2</td>
</tr>
<tr>
<td>3</td>
<td>Settler + Anaerobic Filter</td>
<td>1</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>4</td>
<td>Horizontal Planted Gravel Filter</td>
<td>1</td>
<td>23.6</td>
<td>23.6</td>
</tr>
<tr>
<td>5</td>
<td>Polishing Pond</td>
<td>1</td>
<td>52</td>
<td>52</td>
</tr>
</tbody>
</table>

Total area for treatment modules 951.8
Total area for supporting structures (Road and Operator room) 1643.8
Total FSTP Area 2595.6


Figure 2: Layout Plan FSTP in Khandela
Figure 3: Flow Diagram of faecal sludge treatment process

IV. DUE DILIGENCE REPORT

13. During the preparatory stage (before initiation of FSTP works) of the subproject, the land acquisition and involuntary resettlement issues were examined in line with ADB’s Safeguard Policy Statement (SPS), 2009 and relevant land records and site photographs of proposed FSTP site was shared with the ADB. The civil work has started, and as a corrective measure, the field-based due diligence was carried with the objective to identify resettlement (permanent or temporary) impacts on titled/non-titled households if any caused during the execution.

14. A due diligence visit was undertaken to FSTP site to –

- Assess whether the sub-project causes any resettlement impacts (temporary/permanent, partial/full) impacts on structures and livelihoods non-titled affected persons (APs).
- To collect evidence (documents, photographs, and videography) to understand/ identify resettlement impacts, if any.
- To organize public consultation along the project sites to discuss the resettlement impacts

15. Due diligence/ field visits (conducted by a team including staff of PIU, Department of Urban Local Body (ULB), Project contractor, and safeguard staff from Consultant). During the site visits and ground verification conducted during the implementation period, it was confirmed that the construction of FSTP does not involve any land acquisition and resettlement impact, including livelihood impacts of titled and non-titled households. FSTP work has been undertaken within the existing solid waste dumping site, which is owned by ULB. (NoC of ULB obtained attached as Annexure 1, and Land revenue records of FSTP site is appended in Annexure 2. Consultation with ULB and other stakeholders was undertaken by the Consultant team to discuss the resettlement impacts. It is to confirm that selected land for FSTP was vacant govt land, and solid waste of the town is being dumped presently by the ULB.

Table 3: Subproject Components and their Land Acquisition and Resettlement Impacts

<table>
<thead>
<tr>
<th>S N</th>
<th>Name of the Components</th>
<th>Permanent Impact on Land Acquisition and Resettlement</th>
<th>Temporary Impact</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Construction of FSTP -10 KLD</td>
<td>No</td>
<td>No</td>
<td>FSTP work is being executed in the existing solid waste dumping site, which is owned by ULB. Vacant and unused land identified by Nagar Palika (ULB) that are government-owned and free of encumbrances. No involuntary resettlement impact is anticipated.</td>
</tr>
</tbody>
</table>


Table 4 Details of land availability, ownership, and status of No Objection Certificate (NOC) for sites

<table>
<thead>
<tr>
<th>Project Component</th>
<th>Location</th>
<th>Ownership</th>
<th>Area of government land available at the location (m²)</th>
<th>Area required (m²)</th>
<th>Khasra No.</th>
<th>NOC Status</th>
<th>Photo of Land</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sewerage System</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction of FSTP of 10 KLD</td>
<td>Existing solid waste dumping site</td>
<td>Nagar Palika</td>
<td>6322.5</td>
<td>2595.6</td>
<td>2404/1</td>
<td>NoC of ULB obtained (Ref Annexure 1). Work is being executed in the existing solid waste dumping site, which is owned by ULB. Land records are appended in Appendix 2.</td>
<td></td>
</tr>
</tbody>
</table>
Figure 4 Location of FSTP Site- Khandela- (27°35'28.38"N 75°29'20.06"E)
V. PUBLIC CONSULTATIONS

16. A series of consultations, including meetings and discussions, were held with the local community and key informants to collect information for this due diligence report. Focus-group discussions (FGD) with residents and operators of present Faecal sludge and septage collection and disposal system were conducted to learn their views and concerns. In addition, interviews were conducted with the officers of the Nagar Palika (urban local body), public health engineering department (PHED), and other stakeholder agencies. The participatory methodology was used to conduct discussions in the community meetings to solicit views, concerns, and suggestions on the proposed subproject works. Consultations also included discussion over subproject objectives, RUSDP implementation arrangements, including grievance redress mechanism (GRM) and safeguards requirements as laid down in ADB’s SPS. Details of public consultation are presented in Annexure 3. Community engagement, public consultations, and disclosure will be an ongoing exercise through the subproject planning and implementation phase.

17. A detailed household sample survey has been conducted in the town, to understand the household characteristics, and the infrastructure service levels, and also the demand for infrastructure services. It was observed that people are willing to extend their cooperation as the proposed activities are proposed to enhance the infrastructure service levels and the living standard of the public. The public expressed their concern regarding the nuisance and disturbance due to present conditions of sludge and septage collection and disposal system. Public demanded for improvement in existing services in the town. Public opined that an appropriate operation and maintenance system should be in place, especially for desludging and collection system, for its best functioning and to have the maximum health and aesthetic benefits.

VI. INFORMATION DISSEMINATION

18. The DDR will be made available in the offices of the Nagar Palika, PHED, Project Implementation Unit, Project Management Unit (PMU), and will be disclosed on ADB and RUIDP website for easy access to all stakeholders including the local community of the town.

VII. GRIEVANCE REDRESS MECHANISM

19. A project-specific grievance redress mechanism (GRM) has been established to receive, evaluate, and facilitate the resolution of stakeholders' concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to record and resolve social and environmental concerns linked to the project.

20. Common GRM. A common GRM will be in place for social, environmental, or any other grievances related to the project. The GRM will provide an accessible and trusted platform for receiving and facilitating resolution of affected persons' grievances related to the project. The multi-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons’ advice at each stage, as required.

21. People will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes will be installed by project ULB/PMU or by e-mail, by post, or by writing in complaints register in ULB/PMU offices. Annexure 4 has a
sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. The PMU Project Officers (Environment & Social) will have the overall responsibility for timely grievance redress respectively on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party through the ULB and contractor.

22. In case of grievances that are immediate and urgent in the perception of the complainant, the contractor, and supervision personnel from the consultant team on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned contractor will be posted at the construction site at visible locations.

(i) 1st level grievance. The contractors, Consultants supervision personnel can immediately resolve issues on-site in consultation with each other and will be required to do so within three days of receipt of a complaint/grievance.

(ii) 2nd level grievance. All grievances that cannot be redressed within three days at field/ward level will be brought to the notice of respective Project Officer (PO) (Environment/Social) of PMU. PO of PMU P will resolve the grievance within seven days of receipt of compliance/grievance in discussion with the Consultant and the Contractor.

(iii) 3rd level grievance. All the grievances that are not addressed by PMU within in seven days of receipt will be brought to the notice of notice of the Grievance Redress Committee (GRC) set up at PMU. GRC will meet once a month and determine the merit of each grievance brought to the committee. The GRC will resolve the grievance within fifteen days of receiving the complaint.

(iv) 4th level grievance. Very major issues that are beyond the jurisdictional authority of the GRC or those that have the potential to cause social conflicts or environmental damage or those that remain unresolved at PMU/GRC level, will be referred to the Empowered Committee (EC). All decisions taken by the GRC and EC will be communicated to the APs by the PMU.

23. The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage, and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM. Alternatively, if the grievance is related to land acquisition, resettlement & rehabilitation, the APs can approach the Land Acquisition, Rehabilitation and Resettlement Authority (LARRA). As per the latest Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation, and Resettlement Act, 2013, the state government will have to establish the LARRA to address grievances in the implementation of LARRA.

24. In the event that the established GRM is not in a position to resolve the issue, the affected person also can use the ADB Accountability Mechanism through directly contacting (in writing)
the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB India Resident Mission (INRM). The complaint can be submitted in any of the official languages of ADB's DMCs. The ADB Accountability Mechanism information will be included in the PID to be distributed to the affected communities, as part of the project GRM.

25. Records will be kept of all grievances received, including contact details of the complainant, date of the complaint received, nature of the grievance, agreed corrective actions and the date of these were effected, and outcome. All costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination) will be borne by the concerned PIU at the city level while costs related to escalated grievances will be met by the PMU.

VIII. CONCLUSION

26. While collecting data from the site, confirmation from stakeholders, it has been confirmed that there is no issue related to land acquisition (LA) in the FSTP site, the land was completely vacant, and was used for dumping solid waste of the town. No rag pickers were identified at this site. Construction of FSTP did not involve any permanent or temporary/partial or full resettlement impact on any asset belonging to titleholder or non-title holder. The execution of the work did not trigger any of the ADB's social safeguard requirements. This subproject is categorized as 'C' for involuntary resettlement (IR), and Indigenous People (IP) as per the Safeguards Policy Statement, 2009.

27. The project will benefit the general public by contributing to the long-term FSSM facility in Khandela in addition to improved environmental and health condition of the town. People would spend less on healthcare and lose fewer working days due to illness, so their economic status should also improve, as well as their overall health.
Annexure 1: Noc of Municipality for construction of FSTP in existing solid waste dumping site

कार्यलय नगरपालिका मण्डल खण्डेला (सीकर) राज.

क्रमांक नामक/2017-18/1588

दिनांक-04/07/17

श्रीमान
परियोजना निदेशक महोदय,
बी.एम.जी.एफ. प्रोजेक्ट आईपी ग्लोबल
आर.युआई.डी.पी.ए धी एस बिल्डिंग जवाहर सर्किल
मालवाय नगर अयपुर।

विषय: फीकल सलज ट्रीटमेंट प्लांट (एफएसटीपी) के सर्वेक्षण एवं निर्माण कार्य के लिए अनापत्ति बाबत।

आपके प्रोजेक्ट सलाहकार द्वारा एफएसटीपी के लिए पुनः नगरपालिका भूमि का आकलन किया गया। आकलन के पश्चात फीकल सलज ट्रीटमेंट प्लांट के निर्माण के लिए खसरा नं. 404 एवं एक्स. 25 हैं 0.75 हैं 0.75 हैं की मांग की गई है। पालिका के नाम रहे भूमि टोस के चलन प्रबंधन के लिए मौजूद हैं। पालिका इससे 0.75 हैं भूमि पर एफएसटीपी परियोजना के सर्वेक्षण एवं निर्माण कार्य के लिए एवं द्वारा अनापत्ति दी जाती हैं।

उपरोक्तानुसार आप द्वारा किये जा रहे कार्य का निरीक्षण पालिका के किन्नर अभियंता एवं एसआई स्वास्थ्य निदेशक के द्वारा किया जाएगा। साथ ही आप द्वारा उक्त निर्माण किया जाकर पालिका को सुनिश्चित करना होगा एवं उक्त संपूर्ण 25 हैं 0.75 हैं भूमि का स्वामित्व नगरपालिका खण्डेला का ही रहेगा। भूमि का खसरा ट्रेस एवं जामाबन्दी सलाह है।

अभिवादन
नगरपालिका खण्डेला
Transcript

Office of Nagar Palika Mandal, Khandela(Sikar) Rajasthan
Letter no-2017-2018/1266 Dated 06.10.2017

To
Project Director

BMGF Project, RUIDP, AVS Building, Jaipur

Sub-No objection certificate for construction of FSTP and conducting a survey for FSSM works.

Sir,

Municipal land is identified by your consultant team for the construction of FSTP and requested to the municipality for allotment of 0.75 hec land under khasra no-2404(total land 2.5 hec). The identified land is reserved for solid waste dumping site. The above land is under the possession of Municipality.

Municipality of Khandela is giving their permission for the construction of FSTP in 0.75 hec of land under khasra no-404.

Assistant Engineer of Municipality and health inspector will supervise the works which will be executed by your department. The entire land will be under the possession of the Municipality of Khandela.

Executive Officer, Municipality, Khandela
Annexure 2: Land revenue records of FSTP site
<table>
<thead>
<tr>
<th>नं.</th>
<th>नाम</th>
<th>भूमि पारक (Land holder)</th>
<th>कारक का नाम, उसके पिता का नाम, जाति तथा निवास स्थान का पता, मेन (देयमो) का प्रकार</th>
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## Annexure 3: Summary of Public Consultations

<table>
<thead>
<tr>
<th>S.No.</th>
<th>Date of consultation</th>
<th>Stakeholders involved</th>
<th>Purpose of consultations</th>
</tr>
</thead>
</table>
| 1     | 2 – Aug- 2017        | • Priyanka Budhania, Executive officer Khandela ULB;  
• Sanjay Sharma, Sanitary Inspector Khandela ULB; and  
• BMGF consultant from RUIDP | Sensitization on FSSM, overview of project |
| 2     | 9-Sep- 2017          | • Pawan Goel, Chairman Khandela ULB;  
• Mr. Sanjay Sharma, SI ULB Khandela;  
• Bajrang Kumar, JEn Khandela ULB and  
• BMGF consultant from RUIDP | Explanation of Treatment Technology involved in FSTP. Identification of potential land parcels for FSTP. Finalization of a land parcel for technical feasibility tests. |
| 3     | 11-Sept- 2017        | • Priyanka Budhania, Executive officer Khandela ULB;  
• Pawan Goel, Chairman Khandela ULB;  
• Mr. Sanjay Sharma SI ULB Khandela;  
• Revenue Officer, Khandela;  
• Forest Officer, Sikar and  
• BMGF consultant from RUIDP | Finalization of land parcel for FSTP construction. |
| 4     | 19-Sept- 2017        | • Priyanka Budhania, Executive officer Khandela ULB;  
• Pawan Goel, Chairman Khandela ULB;  
• Mr. Sanjay Sharma, SI ULB Khandela;  
• Ward councilors of Khandela ULB and  
• BMGF consultant from RUIDP | FSSM sensitization to board members and Issue of NoC for survey and construction of FSTP on selected land parcel by Board of members. |
| 5     | 2 – Aug- 2017        | • AE, PHED Khandela;  
• JEn, PHED Khandela; and  
• BMGF consultant from RUIDP | Water Supply overview in the town |
| 6     | 2 – Aug- 2017        | • Lalit Kumawat, Desludging operator, Khandela  
• Sanjay Sharma, Sanitary Inspector, Khandela and  
• BMGF consultant from RUIDP | Desludging operation in the town. |
| 7     | 22-May-2018          | (Resident, Near FSTP Site)  
• Jagdish Shravan  
• Raghuvir  
• Rajesh  
• Bhagirath Ji  
• Dunaram | Discussion with nearby residents of FSTP site for understanding their perspectives. |
Details of Stakeholders Consultation

Venue – Nagar Palika, Khandela
Dated – 2- Aug-2017
Time – 2:00 pm
Attendees – Priyanka Budhania, Executive officer Khandela ULB; Sanjay Sharma, Sanitary Inspector Khandela ULB; and BMGF consultant from RUIDP.
Agenda – Sensitization for FSSM, overview of project

Key Points of Consultation

To brief about requirement of Fecal Sludge Management (FSM) and Fecal Sludge Treatment Plan (FSTP) in the town, BMFG consultant introduced Fecal Sludge Management and its relevance to the addressing sanitation needs of city. Towns such as Khandela, which have population in the range of 20,000 to 50,000 and do not have any arrangement for FSM. Majority of the towns practice improper disposal, which is extremely harmful. Hence, to manage faecal sludge properly, FSTP of suitable capacity will be constructed for the town. This treatment plant will require a land of ~2 acres.

The ULB officials discussed some key facts about the town:

- Soil stratum of the town is rocky.
- Khandela ULB owns one desludging truck of 3000 liters which is defunct at present.
- A private operator serves the town. He has desludging truck of 3000 liters.
- Operator receives at an average 5 requests in a week.
- Charge per desludging is Rs. 1700/-
- Under Swachh bharat mission 900 toilets are to be built.
- By October ‘17 after intervention of SBM in Khandela municipal area 98% of the population will have access to toilets.

The ULB officials agreed that FSM will be a suitable solution for the town to manage the faecal sludge. It was also acknowledged that charge for desludging operation along with water supply bills is a practical option. It was informed that ULB currently owns a land parcel of 10 bigha, which is used for solid waste management and agreed to provide a No Objection Certificate (NOC) for desired area of this parcel.

For the finalization of NOC, the Executive officer suggested the following steps:

- Proposal will be presented in front of Chairman and Board Members of the town in the next board meeting.
- If Board agrees to the proposal, the NOC of the aforementioned land parcel shall be finalized and handed for FSTP construction.

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Venue – Nagar Palika, Khandela
Dated – 9-Sep-2017
Time – 11:00 am
Attendees – Pawan Goel, Chairman Khandela ULB; Mr. Sanjay Sharma, SI ULB Khandela; Bajrang Kumar, JEn Khandela ULB and BMGF consultant from RUIDP.
Agenda – Explanation of Treatment Technology involved in FSTP and Identification of potential land parcel for FSTP.

Key Points of Consultation
Parameters of required land parcel for construction of FSTP
• Explanation on FSTP technology.
• ULB owned land parcel of approximately 2 acres area.
• The land parcel required for construction of FSTP should be away from settlements (minimum distance 100mts).
• The land parcel should not be situated at a distance more than 2kms from the city center.
• A land parcel with access road and a drain or a water body near to it will be preferred.
• Sloppy terrain will be preferred over plain land parcel.
• Presence of source of electricity.
• The land should be under Khandela Municipal limits and has a land use where construction of FSTP is permitted.

Discussion on available potential Land Parcels for FSTP construction
• The team had a meeting with Mr. Sanjay Sharma SI ULB Khandela and requested for potential land parcels for construction of FSTP.
• Mr. Sanjay Sharma SI ULB Khandela suggested and showed four potential land parcels, which all almost meets the requirement.

Parcel 1 - Solid waste disposal land – A large chunk of land has been provided for solid waste dumping to Khandela ULB, which is currently being utilized as Solid Waste Dumping Ground. A part of that land parcel can be used for construction of FSTP. It is at a distance of ~1 kms from city center.

Parcel 2 - MNREGA developed land – A land parcel allotted for MNREGA activities. It lies at a distance of ~500 mts from the city center. The land parcel has a ground level substantially lower than road level (as the soil of the land is used for different MNREGA activities). The parcel has a small pond nearby.

Parcel 3 - A land parcel situated next of a school in Khandela. City waste water major drain passes over this land parcel. At present rest of the land is used for solid waste disposal by nearby residents.

Parcel 4 - A land parcel adjacent to forest land in Khandela. The land parcel is encroached from one side and also has cremation ground on the other side of it. A water body (small pond) is situated on the other side of the road.

After review of all the available land parcels according to the technical and financial feasibility for the project. Land parcel 1 has been finalized, which is currently being utilized as Solid Waste Dumping Ground. Mr. Bajrang Kumar, JEn ULB Khandela has provided the Khasra no. and Revenue map of the selected land parcel. NoC of the selected land parcel has been issued for construction of FSTP by Mr. Bajrang Kumar, JEn ULB Khandela and Mr. Pawan Kumar Goel, Chairman ULB Khandela.

Venue – Nagar Palika, Khandela
Dated – 11-Sept- 2017
Time – 11:00 am
Attendees – Priyanka Budhania, Executive officer Khandela ULB; Pawan Goel, Chairman Khandela ULB; Mr. Sanjay Sharma SI ULB Khandela, Revenue Office, Khandela, Forest Officer, Sikar and BMGF consultant from RUIDP.
Agenda – Finalization of land parcel for FSTP construction.
Key Points of Consultation
• Mr. Sanjay Sharma SI ULB Khandela and Mr. Pawan Goel Chairman ULB Khandela suggested solid waste disposal land (Parcel 1) as the most suitable land parcel for construction of FSTP.
• The team visited solid waste disposal land to check its technical feasibility for construction of FSTP. The team communicated to Mrs. Priyanka Budhania, EO ULB Khandela that the land has solid waste cover of approximately 5-6 feet all over the land parcel.
• Mrs. Priyanka Budhania, EO and Pawan Goel, Chairman ULB Khandela also considered the land patch for development of boundary wall under the head of solid waste land development work.
• Mrs. Priyanka Budhania, EO ULB Khandela and Pawan Goel, Chairman ULB Khandela has also granted permission for survey of the land to check feasibility of the land for construction of FSTP, under the surveillance of JEn and SI ULB Khandela, after clearance of land patch.

Venue – Nagar Palika, Khandela  
Dated – 19-Sept- 2017  
Time – 11:00 am  
Attendees – Priyanka Budhania, Executive officer Khandela ULB; Pawan Goel, Chairman Khandela ULB; Mr. Sanjay Sharma, SI ULB Khandela; Ward councilors of Khandela ULB and BMGF consultant from RUIDP  
Agenda – FSSM sensitization to board members and Issue of NoC for survey and construction of FSTP on selected land parcel by Board of members.  
Key Points of Consultation  
• The meeting was addressed by EO Khandela, had introduced the agenda of FSSM and construction of FSTP on solid waste disposal land in Khandela.  
• BMGF consultant briefed about FSTP and FSM to the board members. The concept of FSM was discussed in detail, and various board members asked their queries and presented their views on the same.  
• Executive officer and Chairman of the board also asked members suggestions for land parcels for construction of FSTP.  
• Sanitary Inspector and JEn presented the ULB land availability status and explained the land selection procedure.  
• Ward councilor of the ward in which Solid waste management land lies showed interest in construction of FSTP rather than just using the whole chunk for disposal of solid waste.  
• All the board members agreed with No Objection on construction of FSTP on solid waste disposal land.

Venue – PHED, Khandela  
Dated – 2- Aug- 2017  
Time – 3:00 pm  
Attendees – AEn, PHED Khandela; JEn, PHED Khandela; and BMGF consultant from RUIDP.  
Agenda – Water Supply Overview of the town, Khandela.  
Key Points of Consultation  
The PHED officials discussed Water Supply Status of the town:
• Ground water level in the town is more than 600 ft.
• 80% of the households have water supply connections.
• Supply source in the town is Ajabpura River (20kms from Khandela).
• Duration of water supply is 30 minutes once in 2 days.
• During May and June tankers are provided for water supply in the town.
• Supply system presently consist of AC pressure pipelines.
• Pipelines are proposed to be replaced by AI pipelines by Dec’17.
• Average water supply fee charged from households in the town is Rs. 250 per month
• Around 50% households pay water bills in the town.

Venue – Nagar Palika, Khandela
Dated – 2- Aug- 2017
Time – 4:00 pm
Attendees – Lalit Kumawat, Desludging Operator, Khandela; Sanjay Sharma, SI; and BMGF consultant from RUIDP.
Agenda – Desludging Operation in the town.

Key Points of Consultation
• Khandela ULB owns one desludging truck of 3000 liters which is defunct at present.
• A private operator serves the town. He has a desludging truck of 3000 liters.
• Operator receives at an average 5 requests in a week.
• Charge per desludging is Rs. 1700 /-
• Desludging operators do not use any safety gears to carry out desludging operations.
• At present there is no such designated fecal sludge disposal site in the town. Desludging faecal sludge is disposed of in open drains or fields of nearby villages.
• Disposal of fecal sludge on undesignated sites also results into social issues many a times, because of lack of awareness for fecal sludge management in the town.
• Fecal sludge management and desludging activity needs to be regularized by ULB, Khandela.
• With increase in nos of toilet units, desludging demand of the town will also increase which needs to be addressed appropriately in coming time. At present the ULB does not have any facility for FSM.
• FSM is an untouched branch of management at present but requires substantial amount of attention by the regulatory body and health department of ULB Khandela.
Venue – Near FSTP Site  
Dated – 22- May- 2018  
Time – 10:00 AM  
Attendees – Individual Households  
Agenda – Informing about on FSSM and Informing on FSTP site

<table>
<thead>
<tr>
<th>S.No.</th>
<th>Name and mobile no.</th>
<th>Designation and/or Address</th>
<th>Topics Discussed</th>
<th>Outcome of the consultation</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Jaijuk (307) S/C Shankar</td>
<td>Resident, Banjar Basti</td>
<td>Benefits of FSTP</td>
<td>No objection on FSTP in plant is very useful to us.</td>
<td>373/7127</td>
</tr>
<tr>
<td>2</td>
<td>Yogeshwar (507) Resident (Labour)</td>
<td>Banjar Basti</td>
<td>Consent on construction of FSTP, Benefits of FSTP</td>
<td>Good for people, town. Good step for SBM.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Rajesh (507)</td>
<td>Resident, Banjar Basti</td>
<td>Describe the function of FSTP, Treatment process and product benefits</td>
<td>Water can be used for agricultural purpose. Good for environment</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Pratik Talalagi</td>
<td>Resident, Banjar Basti</td>
<td>Benefits of end product like bio solvent, water. Process of degrading</td>
<td>Help to environment, the solvents can be used as compost. Help to farmers.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Bhagwati ji</td>
<td>Resident, Banjar Basti</td>
<td>Benefits of FSTP, End product benefits, Debridging importance</td>
<td>Good for city &amp; public. It should also facilitate wetting.</td>
<td>373/7127</td>
</tr>
</tbody>
</table>

Name and Signature of the person who consulted:

Any special issue noted at site:
## Consultation with Stakeholders (Planning/Implementation Phase)

**Project Town:** Khundela  
**Name of the project:** FSTP Khundela  
**Place of consultation:** Khundela

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<tr>
<th>S.No.</th>
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<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Dharma Singh</td>
<td>Curator</td>
<td>Briefly explained about FSTP and awareness to de-sludge of septic tank periodically</td>
<td>Agreed to construct biolink with his neighbour's fish pond.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Md. Jakir</td>
<td>Khundela</td>
<td>73 years old constructed septic tank and almost time to de-sludge.</td>
<td>They need such FSTP in Khundela and recommend for such plant.</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Vinod Kumar</td>
<td>Khundela</td>
<td>41 years old constructed septic tank and almost time to de-sludge. Awareness about proper de-sludging of septic tank</td>
<td>Recommend for FSTP in Khundela for proper disposal.</td>
<td></td>
</tr>
</tbody>
</table>

Name and Signature of the person who consulted:

Any special issues noted at site:
Photographs of Stakeholder Consultations

Consultation Near FSTP Site

Consultation with Executive Officer at Khandela Municipal Board

On-site Consultations and Discussions

Consultation with Khandela Municipal Board

Consultation with Management Committee – SWD site
Consultations with Desludging Operator

Consultation with technical Team
Annexure 4: Grievance Registration Format
(To be translated and made available in local language(s))

The ______________________________ Project welcomes complaints, suggestions, queries and comments regarding project implementation. Aggravated persons may provide grievance with their name and contact information to enable us to get in touch for clarification and feedback. In case, someone chooses not to include personal details and wants that the information provided to remain confidential, please indicate by writing/typing *(CONFIDENTIAL)* above Grievance Format. Thank you.

<table>
<thead>
<tr>
<th>Date</th>
<th>Place of registration</th>
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**Contact Information/Personal Details**

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<tr>
<th>Name</th>
<th>Gender</th>
<th>Age</th>
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<tr>
<td></td>
<td>* Male</td>
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<td></td>
<td>* Female</td>
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<th>Home Address</th>
<th>Place</th>
<th>Phone no.</th>
<th>E-mail</th>
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**Complaint/Suggestion/Comment/Question** Please provide the details (who, what, where and how) of your grievance below:

If included as attachment/note/letter, please tick here:

**How do you want us to reach you for feedback or update on your comment/grievance?**

**FOR OFFICIAL USE ONLY**

<table>
<thead>
<tr>
<th>Registered by: (Name of Official registering grievance)</th>
</tr>
</thead>
</table>

| Mode of communication: |
| Note/Letter |
| E-mail |
| Verbal/Telephonic |

<table>
<thead>
<tr>
<th>Reviewed by: (Names/Positions of Official(s) reviewing grievance)</th>
</tr>
</thead>
</table>

| Action Taken: |
| Whether Action Taken Disclosed: |
| Yes |
| No |

| Means of Disclosure: |
Annexure 5: Photographs of FSTP site, Khandela

Proposed site for construction of FSTP

Site Photograph