

Meghalaya Integrated Transport Project (MITP)

CONTINGENCY EMERGENCY RESPONSE COMPONENT (CERC)

ADDENDUM ENVIRONMENT AND SOCIAL MANAGEMENT FRAMEWORK

1 INTRODUCTION AND BACKGROUND

The Government of India (GoI) received financing from the World Bank (WB)/IDA to implement the Meghalaya Integrated Transport Project (MITP) (P168097) to improve transport connectivity and efficiency in the project districts and modernize transport sector management in Meghalaya.

At the time of project review, the project took cognizance of the recent floods and landslides triggered by heavy rains from June 17 to 19, 2022, affecting six hundred thousand people in about 900 villages and 34 numbers of fatalities. A preliminary assessment carried out by the Department of Revenue & Disaster Management, Government of Meghalaya (GOM), estimated loss and damage to a tune of about ₹ 3000 million. The State Government has taken up relief works and temporary restoration of critical infrastructure and services with funds available under the State Disaster Relief Fund. The State has also sought financial assistance from the National Disaster Relief Fund of about ₹ 7000 million. The State Government also decided to trigger the provisions for immediate response to any Eligible Crisis or Emergency, under **Component 4 - Contingent Emergency Response Component (“CERC”) of MITP**.

CERC facilitates the reallocation of project funds to support response and reconstruction and/or channel additional funds that become available as a result of an emergency, natural disaster, and or any eligible crisis. The provisions under this component would support the enhancement of emergency preparedness, management, and response capabilities including restoration of critical infrastructure and services as well as rehabilitation works to “build back better”. Project MITP is supported by the IBRD loan of amount US\$ 150 million using an Investment Project Financing (IPF) instrument structured through four components¹. The CERC, the fourth component, can be activated, and the funds can be utilized to finance emergency response and recovery activities and related eligible expenditures in support of the government’s rapid emergency response efforts.

GOM submitted a written request to the Government of India (GOI) for CERC activation for an amount of USD 30 million from project MITP vide Letter No. PLR.73/2015/Pt./348 dated 6th July 2022, to meet the urgent fund requirement for immediate emergency restoration works resulting from the recent natural calamity. The GOI in its letter no. F. No. 07/01/2017-Infra & Rural dated July 22, 2022, confirmed its No-Objection for reallocation of 30 million USD to CERC.

This document is prepared as an addendum to the existing Environment and Social Management Framework (ESMF) for MITP. It describes additional information on the environment and social safeguard (ESS) requirements for the implementation of the proposed activities to be carried out under the positive list of CERC and together with MITP-ESMF form the CERC-ESMF.

The guidance and procedures included in this CERC ESMF should be considered as part of the CERC Operational Manual prepared for project implementation. The guidelines and procedures included in this ESMF CERC Addendum take into account the Bank’s safeguard requirement for the CERC (Bank’s Guidance on CERC, October 2017).

Activities financed under the contingent component will be limited to the provision of critical goods and services, as well as repair or reconstruction of damaged infrastructure outlined in the positive list of the

¹ Total project cost is US\$ 150 million and loan size of US\$ 120 million.

CERC Operations Manual as well as presented in the table below. Land acquisition leading to involuntary resettlement and/or restrictions of access to resources and livelihoods is not anticipated. It is also unlikely that changes to the existing safeguards instruments of the project will be required.

Table 1: Positive list of goods, services, and works

Item
Goods
<ul style="list-style-type: none"> • Construction materials, equipment, and machinery • Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.) • Lease of vehicles (Vans, trucks, and SUVs) • Gasoline and diesel (for air, land, and sea transport) and engine lubricants • Spare parts, equipment, and supplies for engines, transport, construction vehicles • Equipment and supplies for communications and broadcasting (radios, antennas, batteries) • Any other item agreed to between the World Bank and the Recipient (as documented in an Aide-Memoire or other appropriate formal Project document)
Services
<ul style="list-style-type: none"> • Consulting services related to emergency response including, but not limited to urgent studies and surveys serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities; • Feasibility study and technical design; • Works supervision • Technical Assistance in developing TORs, preparing Technical Specifications, and drafting tendering documents (Bidding Documents, ITQ, RFP). • Non-consultant services including, but not limited to: drilling, aerial photographs, satellite images, maps, and other similar operations, information and awareness campaigns;
Works
<ul style="list-style-type: none"> • Repair and rehabilitation of damaged infrastructure including, but not limited to: water supply and sanitation systems, roads, bridges, and other infrastructure damaged by the event (after agreement with World Bank); • Removal and disposal of debris associated with any eligible activity;
Training
<ul style="list-style-type: none"> • Conduct necessary training related to emergency response including, but not limited to the Implementation of EAP; • Training on rapid needs assessment and other related assessments;
Emergency Operating Costs
<ul style="list-style-type: none"> • Incremental expenses by the Government for a defined period related to early recovery efforts arising as a result of the impact of an emergency. This includes but is not limited to: costs of staff attending emergency response, operational costs, and rental of equipment.

2 PROJECT DESCRIPTION

The GOM has prepared an Emergency Response Plan (ERP or the Plan) to address the impacts of the recent floods and landslides to be taken up under CERC. The state shall take up both temporary and permanent restoration of critical roads and bridges, reconstruction of footpaths in the border areas, water supply, slope stabilization, and provision of alternative livelihood opportunities to affected farmers.

Based on the CERC guidelines, a subset of activities aligned with the positive list provided in the CERC Operations Manual² is proposed to be carried out as part of the Plan.

Table 2: Planned Emergency Activities

Areas of Intervention	Activities to be Implemented	Implementing Agency	Support Institution
Roads & Bridges	Temporary and permanent restoration of roads and bridges	PIU - PWD	MITP PMU
Footbridge	Reconstruction of footbridges in the border areas	PIU - Border Area Development (BAD)	MITP PMU
Water Supply	Temporary restoration and reconstruction of the water supply connection	PUI - PHED	MITP PMU

2.1 Details of Affected Infrastructure

The summarized details of the affected infrastructure for which works to be taken up under the CERC are highlighted in the table below.

Table 3: Summary of Damages

Damages under Sectors	The approximate cost (INR Lakh)		
	Temporary Restoration	Permanent Restoration	Total Value of damages
Road Sector	₹ 5,218	₹ 16,554	₹ 21,772
Water Supply Schemes	₹ 1,537	₹ 3,648	₹ 5,185
Projects Under Border areas development department	₹ 470	₹ 629	₹ 1,099
Grand Total	₹ 7,225	₹ 20,831	₹ 28,056

a) Roads Sector

Roads and bridge infrastructure suffered colossal damage all across the state. The notable damages due to rain-induced events such as landslides and floods include complete washing away of bridges, bridge decks, and culverts, the collapse of retaining walls and other retaining structures, and complete washing

² Appended to this document as Annex 1 – Positive List

away of roads leading to dysconnectivity. Damages to road pavements include major crack formation, landslips on roads and earthfalls; subsidence of roads and bridges rendering them unusable, deep rutting of roads and drains, and footbridges in the border areas. Some of the most affected regions include the southern slopes of the East Khasi Hills District, South-West Khasi Hills, East Jaintia Hills, South Garo Hills, and West Garo Hills. Reconstruction and rehabilitation of this damaged infrastructure at the earliest are critical for the overall development of those affected areas.

Table 4: District-wise loss and damage assessment of Roads Sector

Regional Wise	Approximate cost (Rs. In Lakh)		Total
	Temporary Restoration	Permanent Restoration	
Khasi Hills	₹ 2,048.14	₹ 4,323.80	₹ 6,371.94
Jaintia Hill	₹ 379.14	₹ 1,223.34	₹ 1,602.48
Garo Hills	₹ 2,790.82	₹ 11,006.48	₹ 13,797.30
Grand Total	₹ 5,218.10	₹ 16,553.62	₹ 21,771.72

b) Water Supply

The flash flood created heavy landslides and damaged the infrastructures of different water supply schemes viz., Intake Structures, Pump House, Pumping Main & Gravity, and Distribution lines including siltation upstream of the impounding dam and even washing away the pipelines in some water supply schemes, leading to complete disruption of water supply schemes. There are about 391 Nos. of Water Supply Schemes affected due to the recent flash flood under the 19 divisions of the PHE Department.

Table 5: District-wise loss and damage assessment of the Water Sector

Regions	Approximate cost (Rs. In Lakh)		
	Temporary Restoration	Permanent Restoration	Total
Khasi Hills	₹ 126.10	₹ 664.36	₹ 790.46
Garo Hills	₹ 1,312.85	₹ 2,385.46	₹ 3,698.31
Jaintia Hills	₹ 97.98	₹ 598.66	₹ 696.64
Grand Total	₹ 1,536.93	₹ 3,648.48	₹ 5,185.41

c) Border Areas:

Table showing the cost of loss and damages of the footbridges due to natural calamity under Border areas development department.

Table 6: District-wise loss and damage assessment at Border Areas

Regions	Approximate cost (Rs. In Lakh)		
	Temporary Restoration	Permanent Restoration	Total
Khasi Hills	₹ 165.11	₹ 159.30	₹ 324.41
Garo Hills	₹ 294.55	₹ 470.00	₹ 764.55
Jaintia Hills	₹ 10.00	₹ 0.00	₹ 10.00
Grand Total	₹ 469.66	₹ 629.30	₹ 1,098.96

3 POLICY, LEGAL AND REGULATORY FRAMEWORK

Policies, laws, and regulations, relevant and applicable safeguards policies of the GOI and that of the World Bank as mentioned in the ESMF³ of Meghalaya Integrated Transport Project (MITP) will apply to the CERC component as well. All the labor laws, workers' health and safety guidelines, community health & safety guidelines, and COVID-19 guidelines shall be followed as applicable for workers engaged in civil works. Additionally, all project activities including those financed through the CERC, are subject to World Bank Operational Policies as identified in the ESMF and Operations Manual of the CERC Component and continue to be applicable for activities financed through CERC. A list of additional applicable legal and regulatory environment and social rules and regulations for the CERC Component, especially the sub-projects in the sector of water supply.

3.1 Environmental and Social Laws, Regulations, and Policies

Table 7: Environmental and Social Laws, Regulations, and Policies that are relevant to the proposed CERC Component

Act / Regulation/ Policy	Agency Responsible	Key Objective and Provisions	Relevant to the Project
Meghalaya State Water Policy 2019	Department of Water Resources	<p>The State Water Policy of Meghalaya intends to “achieve sustainable development, management and use of Meghalaya’s water resources with community participation to improve health and livelihoods, reduce vulnerability while assuring good governance for the present and future generations by promoting Integrated Water Resources Management”.</p> <ul style="list-style-type: none"> - Efforts would be made to provide piped water supply in Rural Areas with provision for house connections with the level of water supply as per applicable guidelines and availability of resources. - Efforts would be made to provide good and consistent service and delivery system to provide good quality water. Multiple sources for drinking water supply will be 	While planning for restoration and rehabilitation of water supply schemes viz., Intake Structures, Pump House, Pumping Main & Gravity, and Distribution lines, all directives given under the policy should be addressed.

³ First published in January, 2020 and revised in June 2020.

Act / Regulation/ Policy	Agency Responsible	Key Objective and Provisions	Relevant to the Project
		<p>encouraged to ensure water security. Recycling and re-use of water after treatment to specific standards would be encouraged to ensure water sustainability.</p> <ul style="list-style-type: none"> - Water loss due to leakages, pilferage, etc. would be reduced. 	
The Meghalaya Water Act, 2011	Department of Water Resources	An Act to provide for water rights and obligations; conservation, control, management, and use of water resources and supply; constitution of water and sewerage authorities; facilitate devolution and decentralization of management; elicit public and private participation; the provision of safe water, sewerage services, the regulation thereof and for matters connected therewith or ancillary or incidental thereto.	All activities related to water supply and or directly or indirectly dealing with water resources of the state should not carry out any activity that involves water use in such a way too pollute or allow pollution of water, deteriorating the status of surface water and groundwater, cause harm to human health or the environment, in particular, aquatic ecosystems and terrestrial ecosystems directly depend on the aquatic ecosystems, and not contribute to the origination of drought and flood;
Meghalaya Water Supply Rules, 2008	Public Health Engineering Department (PHED)	The rules notified designate the competent authorities for sanctioning water supply connections in the state and charging tariffs for commercial connections. They give the officials of the PHED the power to provide or deny water supply connections based on the location and feasibility of the unit and provide a temporary connection for house construction. The bylaws consider equity and provide for only one connection per	As water supply schemes will be rehabilitated, the capacity of the schemes needs to be computed based on the given rules and acts.

Act / Regulation/ Policy	Agency Responsible	Key Objective and Provisions	Relevant to the Project
		<p>premise and prohibit (and also provide for penal action) the installation of pumping devices on the mains and service pipes or the use of water from a domestic connection for non-domestic purposes.</p>	
<p>Meghalaya Identification, Registration (Safety & Security) of Migrant Workers Act, 2020 & Inter State Migrant Workmen (Regulation of Employment and Conditions of Service)</p>	<p>Labour Department</p>	<p>to provide for the maintenance of public order and the protection and safety of Migrant Workers in the State of Meghalaya, by identification and mandatory registration of all such workers in the State.</p> <p>And to prevent the commission of offenses of harassment, intimidation, discrimination, and such other act or omission that may affect the safety and security of Migrant Workers, and to further ensure the safety and security of all Migrant Workers during employment within the State of Meghalaya and for matters connected therewith.</p>	<p>If migrant works are to be contracted for the subprojects:</p> <p>Every Migrant Worker shall have to register himself/ herself and obtain a separate Registration Card as issued under the provisions of this Act and rules;</p> <p>It shall be the duty of every person, employing or engaging any Migrant Worker in any manner whatsoever to ensure the registration of such Migrant Worker failing which, the owner of any such establishment shall be liable to a fine which may extend to five thousand rupees;</p> <p>It shall be the duty of the owner of any establishment, employing or engaging Migrant Worker to ensure the safety and security of the Migrant Worker during the currency of the employment;</p>

3.2 World Bank Environmental, Health, and Safety Guidelines

Following are the World Bank EHS guidelines applicable to the Component:

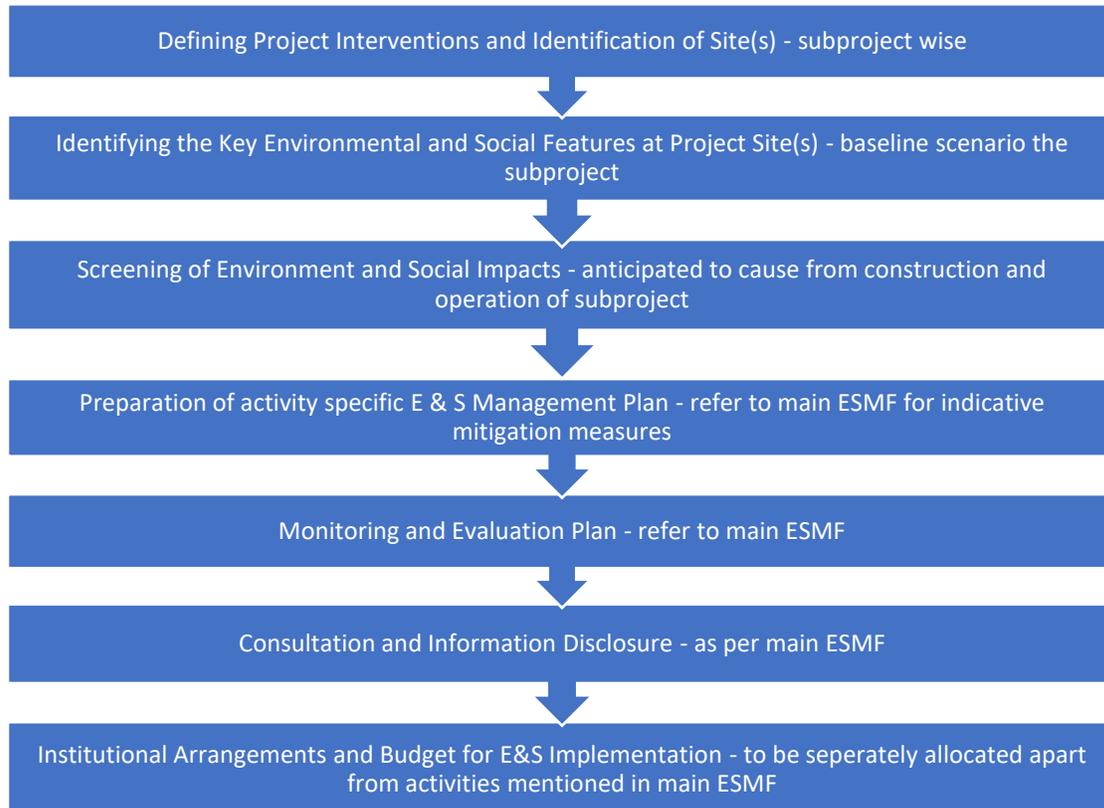
- **Occupational Health and Safety Guidelines** – Provides guidance and examples of reasonable precautions to implement in managing principal risks to occupational health and safety. PMU Health should hire contractors that have the technical capability to manage the occupational health and safety issues of their employees, extending the application of the hazard management activities through formal procurement agreements. Further guidance for these can be found at IFC General Environmental Health and Safety Guidelines: <http://documents.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>
- **Community Health and Safety** - This guideline recognizes that project activities, equipment, and infrastructure can increase community exposure to health, safety, and security risks and impacts and prescribes ways and means to avoid or minimize such risks and impacts, with particular attention to vulnerable people because of their particular circumstances. In addition, communities that are already subjected to impacts from climate change and or other health impacts such as COVID 19 pandemic, may also experience acceleration or intensification of impacts due to project activities. The guidelines to be followed by the PMU Health and contractor in case of a pandemic like COVID 19 have been given in Annex 6 of MITP's ESMF. Further guidance for these can be found at IFC General Environmental Health and Safety Guidelines: <http://documents.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

4 POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS IDENTIFICATION AND MITIGATION

4.1 Steps for assessing the environmental and social impacts and defining a project-wise mitigation plan

The following steps should be followed by each subproject to be funded through CERC Component of MITP regardless of the project implementation unit. The following steps are to be read and referred to along with the main ESMF of MITP.

Figure 1: Steps for Impact Identification and Mitigation Planning



As a first step, the environmental and social impacts are to be identified by filling in an environmental and social screening checklist with basic information on the environmental and social aspects of the proposed sub-project. For this purpose and for ease of following a Screening Checklist has been formulated and annexed to this CERC-ESMF (**Annex- 2**). The basic environmental and social data about the proposed subproject be compiled during the initial field data collection stage. Based on the impacts identified, each of the subprojects needs to define a site-specific Environment and Social Mitigation Plan (E & S MP). The MITP ESMF includes templates for relevant Environmental and Social Management Plans (MPs) and guides the general construction works as well as specific to roads and bridges. **Each of the subprojects can take guidance from the given measures and develop subproject specific E & S mitigation plan, followed by its monitoring and evaluation plan.**

Since the activities financed under the CERC component will be limited to the restoration and rehabilitation of existing infrastructure, land acquisition leading to involuntary resettlement and/or restrictions of access to resources and livelihoods is not anticipated.

The table below identifies the potential impacts of the proposed activities envisioned under CERC actions.

Table 8: Potential impacts of the proposed activities proposed under the CERC and Mitigation Plan

S. N.	Subprojects/ Activities	Potential E&S Risks or Impacts	Safeguard Due Diligence
1.	Restoration and rehabilitation of damaged roads and bridges	Increase dust, noise, water pollution, solid/hazardous/toxic wastes, waste oil/fuels, public health, and safety; possible use of asbestos-contaminated as construction materials and impacts on tribal and vulnerable groups;	PIU (PWD) to ensure to follow all mitigation measures delineated in MITP ESMF
2.	Restoration and rehabilitation of damaged water supply schemes	<p>Apart from the above, the additional risk could be:</p> <ul style="list-style-type: none"> - risk of accidents while laying pipes in densely populated areas, disturbance to wildlife in eco-sensitive zones, possible breaking of old sewage pipelines and contamination, electric shocks from electricity pipelines breakage; - Poor site management, does not take into account terrain resulting in erosion and risk to labor working in hill areas 	<p>Apart from following all relevant mitigation measures mentioned in MITP-ESMF, PIU (PHED) should also follow the below measures:</p> <ul style="list-style-type: none"> - Monitoring of construction agency undertaken to ensure compliance to required regulations and safety norms. - Construction area cordoned off from the public and required notices, lights, etc to warn the public in place to ensure minimal possibility of accidents. - Proper scaffolding in place and safety equipment for workers where working in heights and dangerous areas, - Identification of other utility networks and planning of activities accordingly to ensure minimal breakages and damages to any utility. - Where wildlife disturbance is possible, no working at night or at times where wildlife movement exists, minimize noise and other possible risks. - Vehicular movement not to take place at night. - Cordon off the construction area to minimize the risk of wildlife entering the area.
3.	Restoration and rehabilitation of damaged footbridges	<p>Apart from the above as mentioned in row 1, the additional risk could be:</p> <p>risk of accidents while laying footbridges overflowing river</p>	<p>Apart from following all relevant mitigation measures mentioned in MITP-ESMF, PIU (BAD) should also follow the below measures:</p> <ul style="list-style-type: none"> - Monitoring of construction agency undertaken to ensure compliance to required regulations and

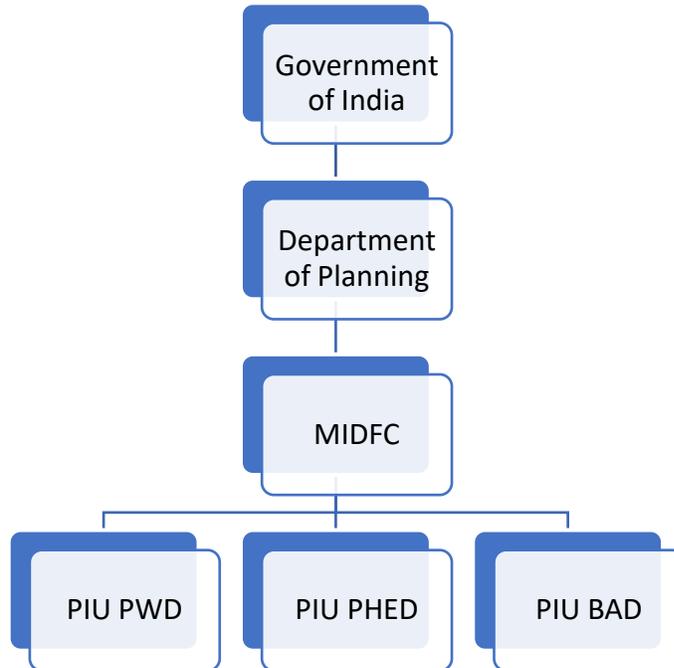
		water;	safety norms; - Construction area cordoned off from the public and required notices, lights, etc to warn public in place to ensure minimal possibility of accidents; - Proper scaffolding in place and safety equipment for workers where working in heights and dangerous areas;
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5 MONITORING AND EVALUATION

ESMF of the project describes detailed supervision, monitoring, and evaluation of the impact of the project on the environment and social aspects. The MITP PMU has appointed Environment and Social experts at PMU. **Each of the PIUs (PHED and BAD) should identify/ hire dedicated E & S Safeguard officers to monitor and evaluation of the safeguard mitigation plan implementation.** The PMU will review these reports and identify the technical, managerial, policy, or regulatory issues with regards to the ESMF compliance and report to World Bank by following reporting schedule mentioned under MITP ESMF.

6 INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENT

1. The PIU (PWD), PIU (PHED), and PIU(BAD) are responsible for the overall implementation arrangement of the CERIP and the project. The PMU to MITP will provide the technical support for supervising the implementation of activities; both services and delivery of goods to facilitate coordination and avoid duplication of efforts from the implementation point of view.



2. Due to limitations in terms of institutional capacity and technical expertise third-party partners, and other non-governmental organizations can be recruited by the PIUs for the partial implementation of the response plan and/or building the capacity of the government to deliver. In such cases, PIU will be directly responsible for the fiduciary implementation/oversight.
3. The institutional and implementation arrangements to manage environmental and social safeguards in CERC will follow the process that has been agreed upon for the CERC component and overall project. The Project Management Unit (PMU) will provide support to all the PIUs in monitoring and reporting safeguards matters following World Bank guidelines. The Project Implementation Units i.e., PIU PWD, PIU PHED, and PIU BAD are responsible for compliance with the safeguard requirements.

7 ANNEXURES

7.1 Annex 1– Positive List

Table 9: Indicative Positive list of goods, services, and works for Emergency Response

Goods
<ul style="list-style-type: none">• - As per Annexure 1,2,3 attached
Non-Consulting Services
<ul style="list-style-type: none">• - As per Annexure 1,2,3 attached
Consulting Services
<ul style="list-style-type: none">• - As per Annexure 1,2,3 attached
Works
<ul style="list-style-type: none">• - As per Annexure 1,2,3 attached
Emergency Operating Costs
<ul style="list-style-type: none">• - As per Annexure 1,2,3 attached

7.2 Annex 2 - Screening Checklist

The first and foremost task is to prepare a screening checklist defining the scope and boundary of impact assessment studies. The screening checklist shall facilitate identification of any likelihood of substantial social and environmental impacts arising due to the nature, scale, and location of the activities.

Apart from the checklist below, following should be essentially confirmed:

- All constructions to be on government land that is free of encroachment and other encumbrances;
- If land is being donated, clear evidence of land donation should be archived, and the donated land should not be more than 10% of the total land owned by the owner of the land;
- Should there be construction on land belonging to tribe or in tribal areas, PMU/ PIU health to ensure Free and Prior Informed Consent (FPIC) is obtained;
- PMU/ PIU health should ensure availability of certified Incineration Facility at CBWTF Secure landfill in case of PHCs and Sub centres;
- PMU/ PIU health to ensure that the land chosen for deep burial follows all relevant Guidelines by CPCB under COVID-19 waste management, as well as Guidelines provisioned under Bio-Medical Waste Management Plan, annexed to this document.

The table below provides a sample on Environment and Social Checklist for all Civil Work envisaged within CERC Component.

Table 8: Environmental and Social Screening Checklist

S. No.	Environmental & Social Features	Presence within 500mts from activity sites (Yes/No) If yes, mention distance in km)	Type of Impact (+ or -)	Significance of Impact (High (H), Medium (M), Low (L))	Likelihood of Impact (Likely, Unlikely)	Description of Impact
Physical Environment						
	Standing water bodies (ponds, lakes, etc.)					
	Flowing water bodies (rivers, rivulets, streams, canals, springs etc.)					
	Ground water sources (open wells, bore wells, etc.)					
	Meandering River					
	Erosion prone stretches					
	Areas with high slope (higher than 15 percent)					
	Landforms (hills, valleys)					
	Coal Mine, Strone Quarry, Sand Mining					
Biological Environment						

	National Park / Wildlife Sanctuary					
	Reserved Forests					
	Community Forest					
	Clearance of vegetation/tree-cover of girth size more than 20 cm					
	Sacred Groves					
	Presence of endangered species / habitat areas					
	Migratory routes					
	Ecologically sensitive areas					
Human Environment						
	Settlements/Habitations					
	Sensitive Receptors (schools, markets etc.)					
	Drinking water sources					
	Underground utility lines like electricity lines, pipelines for gas, etc					
	Physical cultural resources – Protected monuments, historical/ heritage sites etc.					
	Physical cultural resources – Religious structures, other sites significant to community					
	Agricultural land					
	Defence Installations / Airports					
	Heavy polluting Industry					
	Water or Wastewater Treatment Plant					
	Disruption to traffic movements					
	Health risks due to unhygienic conditions at workers' camps					
	Safety hazards during construction					
	Do subprojects of this nature / type require prior environmental clearance either from the MOEF&CC or from a relevant state					

	government department-SEIAA, State Wildlife Board, Forest Clearances, etc.?					
	Please attach photographs and location maps along with this completed Environmental Information Format for Screening.					
Social Safeguard Issues						
	Any loss / reduction of access to traditional dependent communities (to areas where they earn for their primary or substantial livelihood).					
	Adverse impacts to women, gender issues including economic and safety concerns					
	Presence of Indigenous / vulnerable communities					
	Involuntary acquisition of private land leading to loss of shelter, livelihood, source of livelihood					
	Whether land acquired / donated is more than 10% of the total holding					
	Land donated has been identified jointly in consultation with the community and owner					
	Involuntary Land taking resulting to loss of income; livelihood; sources of livelihood; loss of access to common property resources and / or private residential and/or property resources.					
	Possible conflicts with and/or disruption to local community					
	Any displacement or adverse impact on tribal					

	settlement(s)					
	Overall Assessment - What is the is the final risk category of subproject?			A/ B/ C		