

**ENVIRONMENTAL AND SOCIAL SAFEGUARD DUE DILLIGENCE  
FOR  
SEWERAGE SYSTEM IN DISTRICT 'A' OF ALLAHABAD, UTTAR PRADESH  
(Subproject-I)**

**1. INTRODUCTION**

Increasing population, haphazard urbanisation and industrial growth in Ganga river basin has resulted in high pollution level in economically and culturally important river Ganga. The Government of India (GoI) has established the National Ganga River Basin Authority (NGRBA) for comprehensive management of the river. The NGRBA program will adopt a river basin approach and has been given multi-sectoral mandate to address both water quantity and quality aspects. The NGRBA is implementing the program with financial assistance from The World Bank in five major states (Uttarakhand, Uttar Pradesh, Bihar, Jharkhand and West Bengal) along the main stem of Ganga. To ensure effective implementation of the program NGRBA has designed a framework that address the technical, environmental and social aspects of each category of investment in the program.

Recently, GOI has requested the World Bank to consider some of the investments that were approved by MoEF / NGRBA prior to the commencement of Bank funded program for retroactive financing. Since these investments were not prepared in line with the agreed framework of the project, Bank team carried out a due diligence to assess the technical, procurement, environmental and social safeguard aspects of each of these projects and their eligibility for financing. The current document provides the details of environmental and social safeguard due diligence carried out by the Bank Team and the agreed action plan for complying with some of the safeguard issues.

The Environment and Social safeguard due diligence was undertaken by the Bank team<sup>1</sup> with co-ordination from Safeguard Specialists from National Mission for Clean Ganga (NMCG). The due diligence process was accomplished through detailed interactions with implementing agency, contractors, site visits and consultation with communities at site wherever feasible. Available DPR, design, drawings were also reviewed during the process.

**2. PROJECT BACKGROUND AND DESCRIPTION OF PROJECT COMPONENTS**

The proposed project aims effective abatement of pollution of river Ganga by providing comprehensive sewage collection, treatment & disposal system using laterals, branches and trunk mains including sewage treatment plant in District A of Allahabad City in Uttar Pradesh, India.

Allahabad is divided under various districts for sewage network and Sewage Treatment Plant (STP) construction purposes (Figure 1). The city's wastewater collection system covers about 45% of the city area and most of this is within the densely populated centre city area. Wastewater (from toilets) is mostly discharged to soak pits or septic tanks where solids are retained and partially reduced in volume.

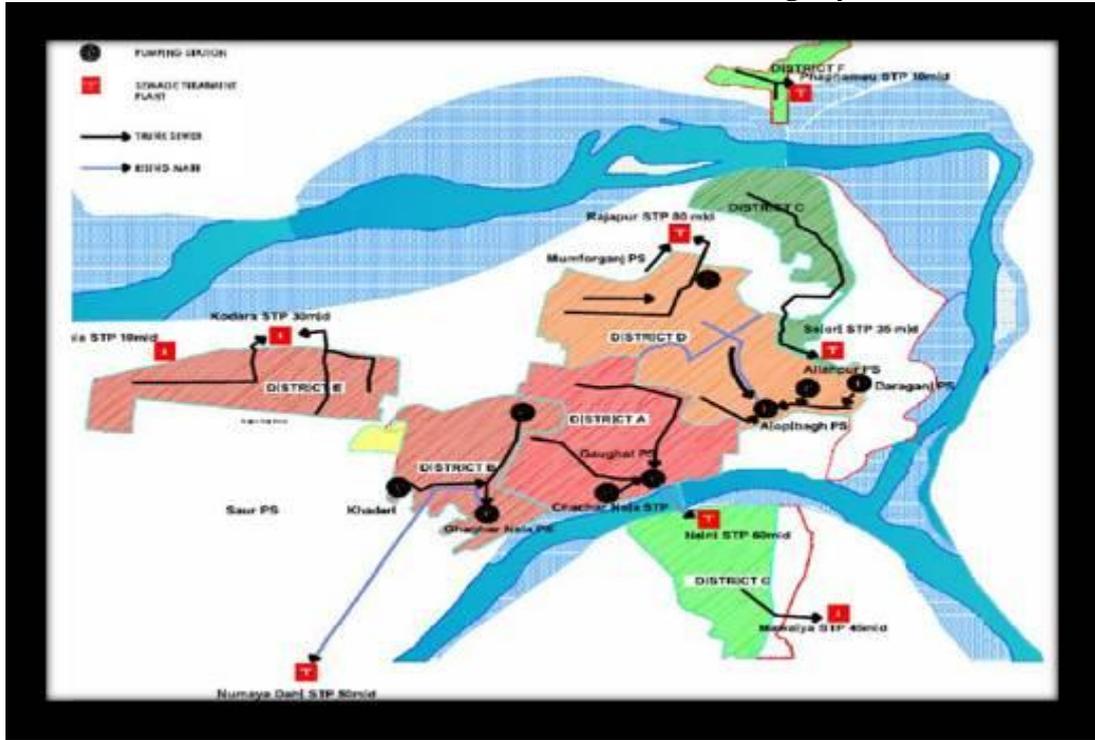
Sewerage system in Allahabad city is quiet old (commissioned in the year 1910) and poorly maintained. The large amount of wastewater currently flowing through open drains pollutes the river Ganga and Yamuna. Total wastewater generation in the City is about 225 million litres per day (2003 estimates) and the effective installed treatment capacity is only of 60.00

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million litres per day. Additional sewage treatment capacity is added in last three years but construction work at these STPs is still in progress.

**Figure 1: Overview of Administrative Area and Bifurcation of Sewage System of Allahabad**



The district A (which is the current project under review) includes the old city area. Wastewater from this area is collected at Gaughat Main Pumping Station (MPS) and pumped through existing rising mains across the Yamuna railway bridge to Naini STP. Defined under the previous master plan as Zone I, the sewerage network has been reconfigured under this Master Plan to provide a smaller catchment area that will not exceed the maximum capacity of Gaughat MPS and Naini STP (ultimate design capacity of 80 mld with expansion). Population densities in this area are generally greater than 300 persons per hectare and water distribution sufficiently good to support full coverage with sewerage. Wastewater that does not enter the sewer system finds its way to Chachar nala, Ghaghhar nala and many smaller tributary drains. Chachar nala flow is at present tapped and pumped to Gaughat MPS. Under the Master Plan a new pumping station is proposed to tap the tail end of Ghaghhar nala.

The proposed STP expanded capacity and sewer network is designed for adequate capacity considering population increase over next 30 years and sewage generation norms. STP is designed with standard units suitable to meet the required treated sewage standards for discharge to inland waters. The projected population and sewage for district A is given below.

	Area in Hectare	Projected Population			Projected Sewage Flow in mld		
		2025	2025	2030	2025	2025	2030
District A	1,321	432,397	<b>4,79,731</b>	503,469	75.67	<b>74.36</b>	78.03

**Proposed Expansion Activities in District A:**

- A. **Expansion of existing STP from 60MLD to 80 MLD at Naini:** Construction is mostly completed except chlorine storage tank area. It was made operational during Kumbh Mela

(festival) on emergency basis. The STP is designed based on aerobic treatment system and is almost identical to existing 60 MLD STP.

- B. **Expansion of SPS (Sewage Pumping Station) at Gaughat:** Expansion includes additional pump house and capacity with screening and pumping facility within existing SPS compound.
- C. **Expansion of SPS at Chachar Nala :** Expansion include additional pump house and capacity with screening and pumping facility on adjacent land purchased from private land owners.
- D. **Laying and Replacement of Trunk Sewer - 9.24 Km:** The construction of sewage network is in progress and it is mostly placed on the existing carriageway of the PWD or Municipal roads
- E. **Desilting and rehabilitation of Trunk Sewer - 5.7 Km:** It is in progress.

### 3. STATUS OF ENVIRONMENTAL AND SOCIAL ASSESSMENT

JICA carried out an Environmental Impact Assessment in the year 2005 as part of feasibility report for the master plan for the entire city. This reports focus on impacts of construction and operation stage both. This also provides suggestions for mitigation measures, Environmental Management Plan including Monitoring and Capacity Building. However, no separate environmental assessment specific to development is carried out at DPR (Detailed Project Report) stage. DPR also doesn't consider the integration of environmental management aspects into the design except JICA's technical suggestion for disinfection of treated water with chlorine before discharge to land for irrigation or to river.

The DPR also doesn't present any social information and no social impact assessment (SIA) was carried out.

### 4. ENVIRONMENTAL AND SOCIAL PROFILE OF THE AREA AND SCREENING

Allahabad is among the largest cities in Uttar Pradesh. Allahabad city lies on the 25°28' North latitude and 81° 52' East longitude. Main land of the city is surrounded by river Ganga and Yamuna in three directions i.e. north, south and east direction. The river Ganga flows on the north and east boundary of the old city while river Yamuna flows on south boundary of old city. New and ongoing developments of the city are on across the river Ganga and Yamuna.

Hindu mythology has it that for the Prakrishta Yajna, Lord Brahma, the creator God of the Trinity, chose a land on earth, on which the three rivers would flow in to a quiet confluence. Brahma also referred to it as 'Tirth Raj' or the 'king of all pilgrimage centres'. Recorded evidence also exists in the revered scriptures – the Vedas and the grand epics, the Ramayana and the Mahabharata, as also in the Puranas – of this holy place formerly called Prayag. Allahabad stands at the confluence of two of India's holiest rivers, the Ganga and the Yamuna. Sangam, as the confluence is called, is the venue of many sacred fairs and rituals, and attracts thousands of pilgrims throughout the year. This number swells to millions during the world famous Kumbh Mela. A third mythical Saraswati river, believed to flow underground towards the Sangam, gives the confluence its other name 'Triveni'.

The total population of Allahabad Municipal Corporation as per 2011 census is 1,112,544 out of which 60,0386 (54%) are male and 51,2158 (46%) are female. The sex ratio of the city

population is 853. The scheduled caste (SC) population is 144,013 (13%) and the scheduled tribe (ST) population is only 1849 (0.2%) within the municipality area.

The literacy status of the Allahabad city shows that 846,038 persons (76%) are literate, of which 79% of male population and 72% of female population are literate. 370,199 (33%) of the city population, constitute working population. The work force participation among male is 48% and in case of female it is only 16%.

The mean monthly temperature of the city varies from minimum 8.7°C (January) to maximum 44.3°C (May). The normal annual rainfall is 1017.7 mm. The months of June to September accounts for about 87% of total rainfall and the highest precipitation of 307.6 mm is recorded in August. The topography of the Allahabad city is flat and the highest flood level of river Ganga recorded is 88.00 meters in 1978.

The ambient air quality in the city is reported to be higher than the prescribed standards particularly with respect to particulate matters (PM<sub>10</sub>) at most of the city areas.

None of the project area involves forest land, or is located close to any ecologically sensitive areas. No archeologically protected monument is located in close proximity. No issue related to indigenous people or involuntary resettlement, are identified in the project.

Environmental and social screening carried out as part of this due diligence exercise using the screening matrix of the Environmental and Social Management Framework of NGRBA Project (**Annexure-1**), concludes that the project components have limited impact to environment and can be mitigated with provision adequate mitigative measures and adoption of environmental management plan. The project hence is categorized as 'Low Impact' category.

## **5. THE DUE DILIGENCE PROCESS**

As part of the due diligence, the team visited the project area on October 14-15, 2013 and carried out detailed interactions with implementing agency, contractors, visited project sites, and consultation with communities. A review of the project DPR, design, drawings was also carried out by the team.

## **6. KEY ENVIRONMENTAL AND SOCIAL FINDINGS**

The due diligence findings are given below and **Annexure 2** (through photographs) presents the profile of the project area.

### **A. Environmental Regulatory Requirements**

1. The subproject has not obtained 'Consent to Establish' the STP, which is a mandatory requirement under Water (Prevention and Control of Pollution) Act 1972 of Government of India.
2. It is advisable to undertake tree plantation around the STP, which will help aesthetically as well as to control bad order. Discussions with UPJN and the contractors indicated that plantation will be done at the STP. However, there is no provision in BOQs of the contract or any plantation efforts at the site where construction is almost completed.

### **B. Project Design/Planning Issues**

3. None of Sewage Pumping Stations (SPS) have defined system of appropriate collection and disposal of bio-degradable and non-biodegradable waste screened out at each of the

SPSs. Currently waste is collected and stored intermittently within SPS site area and disposed to low lying area of the city or to locations where municipal solid waste is being disposed off. As most of these SPSs are located close to habitations, people in close vicinity to these SPSs have indicated issue of bad smell of sewage.

4. None of SPSs has provisions of tree plantation and landscaping which can improve its aesthetic and prevent spread of bad smell.
5. Substantial debris and mud is generated during laying of trunk sewer, construction of SPS and STP. Top soil with good productivity and debris is being disposed off through contractor at low lying areas where ever available. No management plan is prepared for reuse of top soil for agricultural purposes, use of debris as filling material and safe disposal of unusable material. Soil and debris can be well managed for planned land filling and landscaping.
6. Digested sludge from STP is good for use as manure. Currently it is largely being disposed off in unplanned manner in low lying areas or along the roads. It may even find way to river Ganga with rain water run off defeating very purpose of cleaning Ganga. This requires proper management for disposal or sale as organic manure.
7. The sludge from existing 60 MLD STP2 has problem of carryover of small plastic particles making it unacceptable to farmers as manure. Sludge from expanded 20MLD unit also finally gets mixed with sludge from 60MLD plant making sludge of 20 MLD plant also unusable. No provision is made in the design of 20 MLD unit for segregated collection of its digested sludge.
8. There is no provision of holding of untreated sewage in case of STP breakdown. In such situation untreated sewage will flow to river and pollute it.
9. No environmental management plan has been prepared for the project during detailed project report stage for management and monitoring of environmental impacts and mitigation during construction and operation phase. Since environmental impact is minimal and issues are simple, this EMP can be easily evolved with certain guidance. Even simple guidelines can be evolved and referred by implementing agency as reference guidance document. This can be suitably modified as required specific to each sub project.
10. DPR reviewed does not have any separate budget for environmental components including specific monitoring and corrective actions.

#### **C. Construction / OHS Issues.**

11. Occupational health and safety is another area requiring attention. Workers are seen working without any PPE even at height. Even concept of safety like hand rails on both side of walk ways close to deeper water tanks is compromised. In most of STPs hand rails are provided only on one side of walk ways.
12. Smaller on off switches at respective STP units are installed without protection from rain water. This may be cause of electrical short circuit hazard.
13. Integration of adequate safety aspects (protection rails along walk ways at height) in STP expansion design.

#### **D. Operational Aspects and Social - Land Acquisition**

14. The proposed expansion work of Naini STP and Gaughat SPS is being carried out within the existing STP premises.
15. No squatter or encroachments were found and the land is well protected with boundary wall.

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<sup>2</sup> There is no provision of fine screening in its design resulting in carryover of plastic particles in digested sludge.

16. The Chachar Nala SPS expansion site is located along the existing drain (nalla). For expansion of the existing facility, 1110.6 square meters of private land has been directly purchased from 3 landholders. There is no reported displacement or loss of livelihood due to this sub project.
17. The construction of sewage network is in progress and it is placed on the existing carriageway of the PWD or Municipality roads.
18. Project has not carried out any assessment of adverse impact that sub project may have on the community.
19. No specific staff employed or assigned by the implementing agencies to deal with the social safeguard issues in any of these subprojects.

#### **E. Details of Compensation and Other Assistance**

20. Land was purchased only for Chachar Nala. The type of purchased land is *nalla* bed type and the cost of land paid was INR 1.674 million. The negotiation of land rate was conducted by Land Utilization Council headed by District Collector. The land is purchased and registered in the name of Allahabad Municipal Corporation completed. The sale deed papers for purchasing of these lands are attached (refer **Annexure-3**).

#### **F. Stakeholder Consultations**

21. The local communities are aware of the subproject works but no specific public consultations were carried out during project preparation to disseminate project information.

#### **G. Grievance Redressal Arrangements**

22. Though no formal grievances have been recorded, project has not established any project specific grievance redressal mechanism. The only mechanism available is the District Grievance Cell through District Magistrate's office. UP Jal Nigam officials also informally handles grievances if any.

#### **H. Summary Gap Analysis**

The summary gap analysis matrix from safeguard planning and implementation point of view based on the due diligence study is presented in the table below:

<b>Key Principles and Attributes</b>	<b>Gap</b>	<b>Remarks</b>
Assessment of environmental Impacts	Not Carried out	The due diligence indicates no significant impact (except during the construction phase) due to the project
Analysis of Alternatives	Was done as part of project planning, but no specific analysis / documentation done	Carried out as part of the site identification for pumping stations and treatment plant sites. But not documented.
Implementation of Mitigation and Management Measures	Measures to mitigate construction stage impacts being implemented through standard construction contract provisions	Need specific mitigation measures to avoid and manage the construction stage environment and safety issues.
Principle of Avoidance	Analysis of alternative not carried out	Land was directly purchased

<b>Key Principles and Attributes</b>	<b>Gap</b>	<b>Remarks</b>
Linkages with other projects	Not applicable	This sub project is not linked to any other project
Involuntary restriction of access to legally designated parks and protected areas	Not applicable	Does not apply to this project
Recognition of untitled persons such as squatters and encroachers including customary rights	Not applicable	No non-titleholder affected by this sub project
Avoiding displacement of Indigenous People	Not applicable	No indigenous person in the project area
<b>Planning</b>		
Threshold for Resettlement Plan (RP)	No RAP prepared	Land was directly purchased
Need to replace / restore CPRs	Not applicable	CPRs not affected
Consultation and participation of PAPs during project planning	No consultations carried out	
Participation of NGOs in project planning	No NGO involved	
Cut-off date	Not applicable	Not required in this sub project
Definition of a family for R&R assistance	Not applicable	ESMF defines family. Not required in this sub project
Need and scope of census and socio-economic surveys	Not applicable	Census not required as land was directly purchased
Compensation	Not applicable	Direct purchase based on willing seller - willing buyer
Primary Authority for Land Acquisition		District Magistrate facilitated land purchase
Principle to restore/improve living standards	Not applicable	No loss of livelihood
Compensation for land at replacement value		Direct purchase based on willing seller - willing buyer
Treatment of depreciation and Salvage	Not applicable	No loss of structure
Transaction and transition fee	Not applicable	Direct purchase based on willing seller - willing buyer
Land for Land as an option for compensation	Not applicable	Direct purchase based on willing seller - willing buyer
<b>Resettlement Assistance</b>		
Cash assistance over and above compensation	Not applicable	Not required in this sub project
Assistance to poorest of the poor or vulnerable category of people	Not applicable	Not required in this sub project
Provision of infrastructure and public services at resettlement sites	Not applicable	Not required in this sub project
<b>Implementation</b>		
Implementation of RP	Not applicable	Not required in this sub project

Key Principles and Attributes	Gap	Remarks
Participation of civil society in implementation of RP	Not applicable	Not required in this sub project
Opportunity for PAPs to participate in planning, design and implementation	Not applicable	Not required in this sub project
Disclosure of Resettlement Plan	Not applicable	Not required in this sub project
<b>Grievance Redressal Mechanism</b>		
Procedure for dispute resolution and appeals		Government's grievance handling mechanism through the office of district magistrate
Composition of Grievance Redress Committee	NO project specific GRC established	
Participation of representative of PAPs and civil society	No public consultation ever carried out	
<b>Monitoring</b>		
Independent monitoring	No monitoring mechanism in place	
Periodic evaluation and monitoring	No evaluation process in place	

## 7. RECOMMENDED ACTION PLAN

### Regulatory Permissions

1. Consent to Establish under Water (Prevention and Control of Pollution) Act 1972 shall be obtained for the establishment of Sewage Treatment Plant immediately, as this needs to be obtained even before start of construction.
2. Consent condition shall be complied with and compliance report shall be submitted periodically to State Pollution Control Board as per consent condition.

### Environment Management Plan (EMP) Preparation and Implementation

3. An EMP shall be developed which shall identify key environmental issues, the mitigation measure, capacity building training and awareness. Nature of reporting and frequency shall also be defined which should preferably be six monthly. The EMP shall be integrated in the contract documents, with necessary amendments (if necessary) or agreements with the contractor and shall be implemented for the remainder of the construction period.
4. Independent Environment and Social/ Compliance Monitoring Audit by the third party independent inspection agency shall be carried out annually, as per the ESMF requirements of NGRBA program.

### Design and Operational Specific

5. The sludge from the new 20 MLD STP shall be collected separately or existing 60 MLD STP be fitted with fine screens including repair/replacement of the existing screen.
6. Specific site shall be identified for intermittent storage of waste at each SPS and shall be disposed in the designated site.
7. Tree plantation shall be made on the periphery of the SPS site to prevent spread of bad odour and undertake landscaping to enhance aesthetic at each SPS locations.

8. Consideration<sup>3</sup> may be given for constructing garland drain around the site with small opening intermittently in the boundary wall to allow run off rainwater to drain off without accumulating in the adjacent residential areas.

#### Land Acquisition

9. The land was directly purchased for willing seller. Independent Environment and Social/ Compliance Monitoring Audit by the third party independent inspection agency as prescribed in the ESMF to understand the process of direct purchase of land.
10. Advance notice to local residents / shop owners and vendors to avoid inconvenience to vendors / squatters.
11. UP Jal Nigam to (i) buy time on FM radio; (ii) space in local newspaper; (iii) print and distribute pamphlets about the project through newspaper vendors; and (iv) put up information boards at construction site for information dissemination.
12. UP Jal Nigam to (i) provide adequate safety measures during construction; (ii) ensure access to residences and shops; and (iii) spray water to control dust.

#### Stakeholder Consultation and Disclosure

13. Since the public consultation was not carried during the project preparation stage, this should be organised during this implementation stage through awareness campaigns and disclosure of information related to the subproject interventions. UP Jal Nigam to hire services of local NGO / CBO for information dissemination and public consultation

#### Grievance Redressal

14. UP Jal Nigam to establish district specific grievance redress mechanism for the subproject as outlined in ESMF to address the grievances of the community and designate Grievance Redressal Officer.

### 8. IMPLEMENTATION SCHEDULE OF THE ACTION PLAN

S.No	Action	Responsibility	Time frame
<b>Environment Management</b>			
1.	Prepare Generic Environment Management Plan and incorporate in contract	UPJN/SPMG	Immediate / Prior to the Disbursement of retroactive claim under the project
2.	Obtain 'Consent' of UP Pollution Control Board for expansion and operation of STP	UPJN/SPMG	Immediate / Prior to the Disbursement of retroactive claim under the project
3.	Initiate design measures (points 5 to 8 above) and implement	UPJN/SPMG	During the Implementation
<b>Social Safeguards</b>			
4.	Hire NGO/ CBO for information dissemination	UPJN/SPMG	Immediate / Prior to Disbursement of retroactive claim under the project
5.	Prepare IEC material	UPJN/SPMG	One Month after action 4
6.	Establish GRC	UPJN/SPMG	Immediate/ Prior to the Disbursement of retroactive claim under the project
7.	Designate Grievance Officer	UPJN/SPMG	Immediate after Action 6
8.	Information dissemination	UPJN/SPMG	Continuous after Action 5
9.	In-country disclosure of this DDR	UPJN/ULB/NMCG	Immediately (DDR)

<sup>3</sup> The residents are apparently used to current situation due inadequate sanitation situation as present. Water in any case finds its way otherwise and accumulated water drains off gradually.

## Environment and Social information format for screening

<p><b>Project Title:</b> Sewerage System in District 'A' of Allahabad in Uttar Pradesh</p> <p><b>Implementing agency:</b> Uttar Pradesh Jal Nigam (Ganga Pollution Control Unit)</p> <p><b>Project cost:</b></p> <p><b>Project components:</b></p> <ol style="list-style-type: none"> <li>1. Expansion of existing STP from 60MLD to 80 MLD at Naini</li> <li>2. Rehabilitation/Upgradation of SPS (Sewage Pumping Station) at Gaughat.</li> <li>3. Rehabilitation/Upgradation of SPS at Chachar Nala.</li> <li>4. Laying and Replacement of Trunk Sewer - 9.24 Km</li> <li>5. Desilting and rehabilitation of Trunk Sewer - 5.7 Km</li> </ol> <p><b>Project location (Area/ district) :</b> District 'A' of Allahabad</p>			
	<b>Screening Criteria</b>	<b>Assessment of category (High/ low)</b>	<b>Explanatory note for categorisation</b>
1	Is the project in an eco-sensitive area or adjoining an eco-sensitive area? (Yes/No) If Yes, which is the area? Elaborate impact accordingly.	No	
2	<p>Will the project create significant/ limited/ no social impacts?</p> <ul style="list-style-type: none"> <li>• Land acquisition resulting in loss of income from agricultural land, plantation or other existing land-use.</li> <li>• Land acquisition resulting in relocation of households.</li> <li>• Any reduction of access to traditional and river dependent communities (to river and areas where they earn for their primary or substantial livelihood).</li> <li>• Any displacement or adverse impact on tribal settlement(s).</li> <li>• Any specific gender issues.</li> </ul>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>	
3	<p>Will the project create significant / limited / no environmental impacts during the construction stage? (Significant / limited / no impacts)</p> <ul style="list-style-type: none"> <li>• Clearance of vegetation/ tree-cover</li> <li>• Direct discharge of construction run-off, improper storage and disposal of excavation spoils, wastes and other construction materials adversely affecting water quality and flow regimes.</li> <li>• Improper storage and handling of substances leading to contamination of soil and water</li> </ul>	<p>No</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p>	<p>The excavated soil and other waste may affect the water quality if stored in-appropriate manner.</p> <p>The boundary wall may act as barrier in</p>

	<ul style="list-style-type: none"> <li>• Flooding of adjacent areas</li>   <li>• Elevated noise and dust emission</li>     <li>• Disruption to traffic movements</li>     <li>• Damage to existing infrastructure, public utilities, amenities etc.</li> <li>• Failure to restore temporary construction sites</li> <li>• Possible conflicts with and/or disruption to local community</li> <li>• Health risks due to unhygienic conditions at workers' camps</li> <li>• Safety hazards during construction</li> </ul>	<p>Limited</p> <p>Limited No Limited No Limited</p>	<p>absence of garland drains and opening in the boundary walls. Use of noise making equipment like compressors without acoustic enclosures and absence of dust suppression measures may lead to this.</p> <p>This will happen especially during working in the narrow lane areas.</p> <p>Due to inadequate adherence to Occupational Health &amp; Safety Practices including use of PPEs.</p>
4	<p>Will the project create significant / limited / no environmental impacts during the operational stage? (Significant / limited / no impacts)</p> <ul style="list-style-type: none"> <li>• Flooding of adjacent areas</li> <li>• Impacts to water quality due to effluent discharge</li>   <li>• Gas emissions</li> </ul>	<p>No Limited</p> <p>No No</p>	<p>If untreated sewage is discharged to river, in case of STP breakdown.</p>

	<ul style="list-style-type: none"> <li>• Safety hazards</li> </ul>		
5	Do projects of this nature / type require prior environmental clearance either from the MOEF or from a relevant state Government department? (MOEF/ relevant State Government department/ No clearance at all)	Yes	Consent from State Pollution Control Board under Water (Prevention and Control of Pollution) Act, 1972.
6	Does the project involve any prior clearance from the MOEF or State Forest department for either the conversion of forest land or for tree-cutting? (Yes/ No). If yes, which?	Yes	
7	Please attach photographs and location maps along with this completed Environmental Information Format For Screening.	Attached	
<b>Overall assessment</b>		Limited impact	

Photographs taken during Due Diligence – Site Visit

View at Naini STP



View of Expansion Section



Electrical Control without Rain Water Protection



View at Existing STP



Maintenance Activity without Use of PPE



View of Existing Sludge Drawing Bed



View of Oxidation Chamber

**View at Gaughat SPS**



View of Waste Handling



View of Existing SPS Well



View at Existing SPS Pumping System



View of Expansion Building

**View at Chachar Nalla SPS**



SPS Well under Construction



View of SPS Well



View at Existing SPS Pumping System



View at Existing SPS Pumping System

**View at Chachar Nala SPS**



View of Expansion Section



View of Expansion Section Area



View at Existing SPS Building



View at the Entrance Area