ENVIRONMENTAL CODE OF PRACTICE

India SEWA 2025 Digital Financial Inclusion of Informal Sector

JAPAN SOCIAL DEVELOPMENT FUND

SELF EMPLOYED WOMEN’S ASSOCIATION
Environmental Code of Practice

for

DIGITAL FINANCIAL INCLUSION FOR INFORMAL SECTOR

JAPAN SOCIAL DEVELOPMENT FUND

FINAL REPORT
November 2018

Prepared by

SELF EMPLOYED WOMEN’S ASSOCIATION
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<tr>
<td>BEE</td>
<td>Bureau of Energy Efficiency</td>
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<tr>
<td>CLBRC</td>
<td>Community Learning Business Resource Centre of SEWA</td>
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<td>CLC</td>
<td>Community Learning Centres and Trade Facilitation Centre of SEWA</td>
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<td>ECoP</td>
<td>Environmental Codes of Practice</td>
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<td>EPR</td>
<td>Extended Producers Responsibility</td>
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<td>E-Waste</td>
<td>Electronic Waste</td>
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<td>GoI</td>
<td>Government of India</td>
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<td>JSDF</td>
<td>Japan Social Development Fund</td>
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<tr>
<td>LED</td>
<td>Light Emitting Diode</td>
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<tr>
<td>NOC</td>
<td>No Objection Certificate</td>
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<td>OP</td>
<td>Operational Policy (of the World Bank)</td>
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<td>SEWA</td>
<td>Self Employed Women’s Association</td>
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<td>WB</td>
<td>The World Bank – International Bank for Reconstruction and Development</td>
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Executive Summary

Introduction

1. India SEWA 2025 Digital Financial Inclusion of Informal Sector (P167886) aims to foster increased use of digital financial services by women in the informal sector in selected states. The project will work with women from low income and marginalized households and excluded communities. The identified states for the project engagement are Bihar, Uttar Pradesh, Rajasthan, Meghalaya, Assam and Gujarat. The project will target women who lack access and capacity to access digital / mobile technologies for financial transactions and need to be financially literate to keep pace with contemporary market requirements, improve their livelihoods and increase their incomes. The project will reach at least 500,000 women from low income and marginalized households in these states. The project will enhance financial literacy and proficiency in using mobile technology among target groups, and catalyze adoption of digital financial services so that these households can access formal financial instruments for improved livelihoods.

Review of Environmental Aspects

2. The project activities will not adversely impact the environment at the project locations, mainly rural areas of the Project States or its features. The project will not fund any civil works, repairs or renovations. However, the project may support purchase of computers and furniture (mainly computer tables) for additional SEWA Touch points in States excluding Gujarat where additional centers may be set up in rented premises. This may have minor impacts if packaging materials are not managed, air and noise pollution due to transportation of equipment/furniture (which will be minimal at each centre), and lack of awareness on end-of-life disposal of computers and peripherals. In addition, it is essential to provide guidance on selecting the rented premises with necessary toilets and disabled friendly access.

3. These Nine (09) Environmental Codes of Practice (ECOPs) sets out standards and procedures for managing the potential environmental impacts of project activities including purchase of furniture and computers and establishing SEWA Touch Points in rented premises as part of the Project. These include (i) guidance for selecting premises on rental for setting up of touch points with adequate water, sanitation facilities and disabled friendly features, (iii) management of packaging and end-of-life wastes of computers and peripherals, and (iv) minimising the impact of air / noise pollution during transport of furniture / equipment. These impacts are minor, reversible and can be readily managed with good practices. The ECOPs outline simple rules and procedures regarding identification, monitoring and mitigation of those minor environmental impacts. The ECOPs shall be included in all relevant contracts.

Institutional Arrangement

4. SEWA shall have in a place a strong project management team to spearhead and monitor implementation of project activities. This include: a dedicated Project Manager, Finance Manager, Procurement Specialist, Safeguards Officer, Digital Lead and an M&E Specialist. Safeguards Officer at Project Management Unit would co-ordinate on the Environmental Aspects of the Project and provide guidance on ECoP, training to Touch Point staff and Nodal Officer, and monitor its compliance and report to the Project Manager. At each centre, there is an office to coordinate the activities and these offices serve as hub for providing services to the nearby areas in the vicinity of 15 to 20 kms. One of the team members, who would possess more experience or capacity in this regard will be designated to maintain the needed records on ECoP compliance.
Conclusion

5. The ECoP concludes that minimal impacts due to expanding SEWA Touch points can be mitigated and managed through guidance on selecting the premises on rental, and for purchase of furniture and computers. For better environmental management of the ongoing and proposed operations of SEWA under the Project, it is imperative that the institutional capacity of SEWA is improved. This includes the services of a Safeguards Officer to plan, implement and oversee the actions for managing the environmental risks and impacts, continuous updating of ECoP Manual in case of change in Project contours based on Need Assessment Study; Capacity building of the staff, vendors, contractors, associated agencies, and regular monitoring and supervision.

Consultations and Disclosure of ECoP

6. The ECoP is a document subject to public disclosure and consultation.

7. The entire document has been written in consultation with the teams (national and state) of SEWA and its vendors. In the month of October, site visits and meetings with various teams were organised to conduct an environmental assessment. Other stakeholders like CLBRC / CLC officials, vendors and beneficiaries were also consulted. During these consultations, the respondents shared how they are involved in the program, their role, the impact and the suggestions to address project related impacts if any. Based on the consultations and feedback received, the report was revised for draft disclosure. The details of persons consulted is available as Annex I.

8. Comments are invited from on Draft ECoP after disclosing the same. Full report in English and Executive Summary translated to Hindi were disclosed on SEWA website on First Week of November 2018. The document was available online for two Weeks and the information was circulated to all stakeholders of SEWA to invite comments. Comments were incorporated and the Final Report was prepared. The World Bank website also disclosed the document with a link of IA website (after receiving No Objection Certificate (NOC) for its disclosure) after necessary approvals; as per disclosure policy.
Preface

This document is the Environmental Codes of Practices (ECOP) developed to support the Digital Financial Inclusion for Informal Sector under JSDF to SEWA. The ECOPs provides guidelines for environmental management of the minimal project activities including expanding the facilities at SEWA Touch Points, which are seen to be of limited extent, temporary and reversible, and readily managed with good practices during the implementation of the proposed project interventions. The ECOPs will be included in bidding and contract documents as appropriate and its implementation will be closely monitored during implementation.

This is a living document and could be modified and changed in line with the changing situation or scope of the activities, subject to close consultation with the World Bank and clearance of the revised ECOPs.
1. **Introduction to the Project**

1.1. **Project Components**

India SEWA 2025 Digital Financial Inclusion of Informal Sector (P167886) aims to foster increased use of digital financial services by women in the informal sector in selected states. The project will work with women from low income and marginalized households and excluded communities. SEWA is the borrower of this small grant. The identified states for the project engagement are Bihar, Uttar Pradesh, Rajasthan, Meghalaya, Assam and Gujarat. The project will focus on 41 districts in these six states. The project will target women SEWA members who lack access and capacity to access digital/mobile technologies for financial transactions and need to be financially literate to keep pace with contemporary market requirements, improve their livelihoods and increase their incomes. The project will also support SEWA to digitize its service delivery to serve their members better and improve efficiency and productivity. The project will reach at least 500,000 women from low income and marginalized households in these states. The project will enhance financial literacy and proficiency in using mobile technology among target groups, and catalyze adoption of digital financial services so that these households can access formal financial instruments for improved livelihoods.

The project activities will not adversely impact the environment at the project locations; mainly rural areas of the Project States or its features. The project will not fund any civil works, repairs or renovations. However, the project may support purchase of computers, mobiles and furniture (mainly computer tables) for additional SEWA ‘Touch points’ in States excluding Gujarat where additional centres may be set up in rented premises. This may have minor impacts if packaging materials are not managed, air and noise pollution due to transportation of equipment/furniture (which will be minimal at each centre), and lack of awareness on end-of-life disposal of computers and peripherals. In addition, it is essential to provide guidance on selecting the rented premises with necessary toilets and disabled friendly access.

1.2. **Rationale of EECOPs**

This Environmental Codes of Practice (ECOPs) sets out standards and procedures for managing the potential environmental impacts of project activities including purchase of furniture and computers and establishing SEWA Touch Points in rented premises as part of the Project. This include (i) guidance for selecting premises on rental for setting up of touch points with adequate water, sanitation facilities and disabled friendly features, (ii) management of packaging and end-of-life wastes of computers and peripherals, (iii) minimising the impact of air / noise pollution during transport of furniture / equipment. These impacts are minor, reversible and can be readily managed with good practices. The ECOPs outline simple rules and procedures regarding identification, monitoring and mitigation of those minor environmental impacts. The ECOPs shall be included in all relevant contracts.

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1 Financing Modality is Investment Project Financing (IPF) of the World Bank; as a Recipient Executed Trust Fund through Japan Social Development Fund
2. **Review of Applicable Environmental and Social Policy, Rules and Regulations**

2.1. **World Bank’s safeguard policies and guidelines**

Since the project interventions are minimal, no detailed Environmental Assessment would be required for this project. In order to comply with OP4.01 Environmental Assessment and to support SEWA in mitigating any potential environmental impacts due to establishing SEWA Touch Points in rented premises in Project States and for purchase of furniture and computers / peripherals an Environmental Codes of Practice (ECOPs) has been prepared.

2.2. **National Environmental Policies and Legal Framework**

1. Specific activities under this project may not need clearances from National / State level authorities as no Civil construction / repair / renovations are proposed. However, necessary permits for operations may be required from local authorities.

2. Various environmental regulations at the National level which may be applicable for this project include

- Environment (Protection) Act 1986 and Rules 1986
- Water (Prevention and Control of Pollution) Act 1974 and amendments thereof
- Air (Prevention and Control of Pollution) Act 1981 and amendments thereof
- The Batteries (Management & Handling) Rules, 2001
- Fire Safety Rules and National Building Code
- National Health and Safety Requirements
- Solid Waste Management Rules, 2016
- Plastic Waste Management Rules 2016
- e-waste (Management) Rules, 2016
- Labour Laws
3 Environmental Codes of Practice

3.1. Environmental Screening and Assessment

The Project will not finance any civil works, repairs or renovations and is, therefore, not expected to have any significant, irreversible or major environmental impacts. The project would fund purchase of computers and peripherals, furniture (computer tables) and establish Touch Points in rented Premises in Rural areas of Bihar, Uttar Pradesh, Rajasthan, Meghalaya, Assam. These activities may have minor impacts if packaging materials are not managed, air and noise pollution due to transportation of equipment/furniture (which will be minimal at each centre), and lack of awareness on end-of-life disposal of computers and peripherals. In addition, it is essential to provide guidance on selecting the rented premises with necessary toilets and disabled friendly access.

3.1.1. Environmental Management Opportunities

Possible opportunities for improving the environmental performance of SEWA Touch Points including the following:

(a) Preparation of Code of Practice to guide proposed activities
(b) Improvement of the Institutional capacity of SEWA and the partnering agencies to effectively manage environmental impacts.
(c) Design of training and capacity building activities to ensure risk avoidance and management.

Guidance is provided here for (i) Selecting the (rental) premises to be used as Touch Points, and, (ii) for Furniture / Equipment Purchase. Environmental Codes of Practice to manage various impacts associated with these are grouped and elaborated under each Guidance.

3.2. Guidance on Selecting Premises to be used as Touch Points

SEWA Touch Points will be established in rented premises especially in States except Gujarat where SEWA’s penetration is less. These guidelines are expected to improve the selection of these premises, keeping in view the health and hygiene of the surroundings, energy efficiency aspects, disabled friendly features etc. It is expected that all these desirable features may not be available in existing premises. However, the buildings which would have many / most of these features may be considered for selection.

3.2.1. ECoP 01: Locations / Buildings and Housekeeping Standards

Location and Neighbourhood
- Touch Points shall preferably be set up in Commercial or Mixed Landuses (Residential plus Commercial), specially as the locations would be predominantly rural and access to other areas would be minimal.
- Location should preferably be away from hazard / violence prone areas and away from eco-sensitive areas (including Natural Habitat areas) as prescribed in applicable bye-laws / regulations
- Activities within the premises shall not disturb the surrounding landuses or environment.
- All activities associated with Touch Points shall be contained within its premises; without spill overs.
- Touch points should be located in clean premises.

**Access and Parking**
- Touch points shall have good access roads, preferably topped to avoid dust / air pollution.
- Adequate parking facility shall be provided in the premises.
- Provide adequate boards (in safe manner – without any impact also during extreme climatic events) for public information on the use of the premise, with contact details of SEWA Main Office.
- Any un-authorized entry to or exit from the sites should be controlled as much as possible.
- Details on features for Differently Abled persons are provided in ECoP 04.

**Building**
- Selected building shall be of Good (Pucca) Structural Characteristics and functional, stable and with features to ensure its safety from hazards, cleanliness and climate resilience as per relevant Building Codes and Bye-laws
- Building should have good thermal comfort and cross-ventillation
- There shall be adequate appropriate furniture for the staff and visitors to sit and carryout business
- Asbestos or other hazardous material must not be used / stored in the premises
- The building should be compliant to all applicable National / State / Local regulations
- There shall be no dues on tax and other fees /duties applicable to the building or premises
- If the selected ‘Touch Point’ is on higher floor of a building, ensure that the building has suitable fire safety provisions including separate fire exit stairs as per National building Code or existing building bye laws

**Prohibitions**
Following are prohibited in the premises which would be used as SEWA Touch Points
- Cutting of trees
- Illegal dumping of material and debris
- Use of unapproved toxic materials, including lead-based paints, asbestos, etc.;
- Disturbance to anything with architectural or historical value;
- No burning of waste or open fires

**Housekeeping**
The Touch Points shall follow a ‘good housekeeping’ policy at all times. This will include, but not necessarily be limited to the following:
- Ensure considerate site behaviour of the staff;
- Ensure appropriate provisions for maintaining the premises clean; Remove rubbish / wastes at frequent intervals leaving the site clean and tidy; Spills on floors to be cleaned up immediately
- Work materials should be neatly stored
- Walkways should be kept clear of obstructions
- Repair and re-paint as necessary all site hoardings to comply with the local conditions and local regulations.
- Understand the probable hazards and integrate emergency preparedness including evacuation procedures with emergency exits
- Ensuring that all electrical and mechanical service equipment are maintained in good working condition at all times.
3.2.2. ECoP 02: Community Health and Safety

- Rented Premises shall comply with applicable building bye laws and regulations and local arrangements for safe disposal of wastes / waste water / drainage and sewage, if any
- All permits, licence to operate, and applicable tax regulations shall be met.
- Permits for operating Generators if required and as applicable for other equipment shall be arranged.
- Site activities / activities within the touch points shall not cause any negative impact or disturbance on surrounding environment or landuses; especially on Natural Habitats
- All reasonable precautions shall be taken to ensure that all equipment in the premises are operated in a manner so as not to cause safety risk and/or nuisance to the neighbourhood and occupiers.
- Details on Site Management, Access for Differently-abled, and Water and Sanitation aimed at community health and safety are presented in ECoP 03, 04 and 05.

3.2.3. ECoP 03: Differently-abled Friendly Access

Differently-abled persons and the elderly need special arrangements in the environment for their mobility and independent functioning. Most of the buildings have architectural barriers that disabled persons find difficult for their day-to-day functioning.

Guidelines on accessibility laid out by the office of the Chief Commissioner of Disabilities.

**Pathways**

- Walks should be smooth, hard level surface suitable for walking and wheeling. Irregular surfaces as cobble stones, coarsely exposed aggregate concrete, bricks etc. often cause bumpy rides.
- The minimum walk way width would be 1200 mm and for moderate two way movement, it should be 1650 - 1800 mm.
- Longitudinal walk gradient should be 3 to 5% (30 mm - 50 mm in 1 meter)
- Avoid grates and manholes in walks. If grates cannot be avoided then bearing bar should be perpendicular to the travel path and no opening between bearing bars greater than 12 mm in width.
- It is desirable that there is no difference in level. (If a difference is unavoidable, limit it to 20 mm or less).

**Access**

- Prefer buildings with access ramps (preferably with handrails)
- Access path from plot entry and surface parking to Building entrance shall be minimum of 1800 mm. wide having even surface without any steps. Slope, if any, shall not have gradient greater than 5%. Finishes shall have a non-slip surface.
- Walkway should be constructed with a non-slip material & different from rest of the area.
- Adequate space should be allocated for persons using mobility devices, e.g. wheelchairs, crutches and walkers, as well as those walking with the assistance of other persons
- Installation of handrail to support the body weight at the critical places e.g. staircase, toilet, ramp, passage with a change of level (800-850 mm).
Counters
- As per *Minimum Access Provisions Required in Various Types of Buildings*\(^2\); Post offices, banks and financial service institutions; there should be a minimum of 1 lowered service counter on the premises. This is possible to be accommodated in rented premises easily.
- To make a counter easily accessible for a wheelchair user, allow a space about 700mm high and 350mm deep under the counter.

Waiting areas
- Accessible entrances, exists, aisles auditoria, concert halls, assembly halls, and main community or public cinemas, theatres and other places gathering areas. of public assembly. Accessible toilet facilities should be nearby. Seating for persons with disabilities to be accessible from main entrances and lobbies. Various seating/viewing choice to be provided for persons in wheelchairs throughout the main seating area. A minimum of 2 wheelchair spaces for seating capacity up to 100 seats. A minimum of 4 wheelchair spaces for seating capacity from over 100 to 400 seats.

SEWA centre’s decentralised team will take care of the special requirements of the differently abled members and provide them services at their door step through mobile units or through the counters at lower levels within the premises. In remote areas where premises with adequate disabled-friendly facilities may not be available, thus, a dedicated team will take care of the special needs of the differently abled.

Water and Sanitation
- Water Fountains (Drinking): Allow sufficient space around the water fountain to make it easily accessible for wheel chair users. Depending on the type of water fountain allow a space about 700 mm high and 350 mm deep under the fountain.
- Toilets\(^3\): One special W.C. in a set of toilet shall be provided for the use of handicapped with essential provision of wash basin near the entrance for the handicapped.  
  * The minimum size shall be 1500 x 1750 mm.  
  * Minimum clear opening of the door shall be 900 mm. and the door shall swing out.  
  * Suitable arrangement of vertical/horizontal handrails with 50 mm. clearance from wall shall be made in the toilet.  
  * The W.C. seat shall be 500 mm. from the floor.

Telephone Counters
- Allow a space about 700 mm high and 350 mm deep under the telephone stand. The telephone receiver must be placed at a height of 110 cm or less.

Mailboxes
- The mail slot must be located at a height of 1200 mm or less.

Vending Machines
- The coin slot must be located at a height of 1200 mm or less.

\(^2\) [https://cpwd.gov.in/publication/aged&disabled.PDF](https://cpwd.gov.in/publication/aged&disabled.PDF)

\(^3\) Visitors to Touch Points may be low, and mostly come from nearby rural areas where they live. Considering the low availability of desirable type of premises in rural areas, it would be good to dedicate one of the existing toilets as differentially – abled friendly; if the owner is not ready to do modifications.
**General**
- Adequate space and handrails should be provided for persons using mobility devices, e.g. wheelchairs, crutches and walkers, as well as those walking with the assistance of other persons
- Remove any protruding objects and allot sufficient walking space for safe walking.

**Information Board**
- Installation of information board in braille, audible signages (announcements), illuminated signages, layout diagrams to help the persons easily reach the desired place.
- Signs should be designed and located so that they are easily legible by using suitable letter size (not less than 20 mm. high). For visually impaired persons, information board in braille should be installed on the wall at a suitable height and it should be possible to approach them closely. To ensure safe walking there should not be any protruding sign which creates obstruction in walking.

### 3.2.4. ECoP 04: Water and Sanitation Facilities

**Water Supply and Waste Water**
- The premise shall have assured water supply for all operational hours. Water must be available in all toilets and hand wash points.
- There should be adequate facilities for potable water for the visitors (portable water purifiers (with non-plastic drinking cups) as the premises are on rental)

**Toilets**
- Maintain adequate toilet facilities and other welfare facilities for its staff;
- Maintain adequate toilets as per local bye laws for visiting rural women,
- All toilets shall be connected to proper septic tanks with Soakpits, as per applicable local building bye laws

**Waste Water and Drainage**
- All waste water (from hand wash points) channels shall be connected to approved drain outlets or provided with basic onsite root-zone treatment (ditch around a tree with appropriate local plants) within the premise. No waste water shall be allowed to create cess pools which may result in fly menace or odour. Waste water shall be recycled and reused as much as possible; for gardening or other such uses.
- All efforts are required to prevent discharge of wastes (solid and liquid) from premises to rivers and canals and to protect surface and groundwater from pollution and other adverse impacts including changes to water levels, flows and general water quality.
- Water drainage must be designed to avoid stagnant conditions that could create foul odour and unsanitary condition in the premises or surrounding environment.

**Solid Waste Management**
- There should be adequate and appropriate waste receptacles in the Touch Points
- Solid Wastes from the premises shall be disposed properly. It must be segregated and stored in colour coded bins: Separate storage for Biodegradables (closed) and Non-biodegradables.
- Hazardous / e-wastes if any; shall be stored separately.
- Wastes shall be handed over to the concerned / designated agency appointed by the local body
- Small bio-bins to convert organic / biodegradable waste to compost shall be installed in the premise and compost can be used as manure.
- No type of wastes from the premises shall be disposed or dumped in any Natural Habitat areas

3.2.5. ECoP 05: Fire Safety, Emergency Procedures

Emergency Procedures
- Emergency procedures shall be developed to facilitate effective actions in case of medical/fire emergency as well as environmental pollution (usage of diesel generators). The emergency procedure shall contain emergency phone numbers and the method of notifying the statutory authorities.
- Contact numbers and emergency procedures shall be displayed in local language and English.
- Emergency ambulance service / doctor on call shall also be arranged and contact numbers shall be displayed well in the premises. All activities must be suspended during emergency situations.

Fire Prevention and Control
- All touch points shall have in place appropriate plans and management controls to prevent fires with due regard to the GOI regulations. Fire escape route must be displayed at easily visible locations.
- During operation and maintenance of equipment and vehicles, it shall be ensured that the workers are well aware of the procedures and have enough knowledge to comply with them.
- Portable fire extinguishers and other facilities for fire safety shall be available and well maintained as per regulations.

3.2.6. ECoP 06: Energy Efficiency in Premises

- Select buildings which have sufficient natural lighting, tree shading and cross-ventilation; minimising the need for air-conditioning.
- Low Energy Consumption Lighting Fixtures, Fans and water pumps (if water supply is from ground water source) - (Electrical Appliances – BEE Star and Energy Efficient Appliances) shall be used
- Desirable if Lighting of Common areas is by Solar energy/ LED devices
- The building services like electrical, plumbing and drainage have the potential in providing the necessary environmental efficiency. The electrical fittings can be high performance devices, energy efficient devices like LED Luminaries and other such devices.

3.3. Guidance on Purchase and Use of Equipment and Furniture

3.3.1. ECoP 07: Pollution and Safety Related Aspects of Purchase and Transport of Furniture, Equipment

To control nuisance, dust and noise due to transport of goods (Computers, computer tables etc.):
- To meet these, the vendor / supplier shall be asked to
  o follow an appropriate Logistics Plan including optimised selection of route to reduces the distance, time, fuel and hence the total gaseous emission and dust emissions to reduce air / noise pollution
  o Route must be away from natural habitat areas
3.3.2. ECoP 08: Managing of Wastes due to Discarded Furniture, Equipment

Packaging Waste
- Enforce clean-up procedures immediately after unpacking equipment, furniture
- Provide receptacles or demarcate areas to store packaging wastes; adequately protected from rains, winds and extreme weather
- Encourage recycling and reuse of packaging wastes by converting to useful products through SEWAs own waste management chain or using local recyclers
- Disposal of plastics, inerts and rejects shall be at points suggested and approved by the respective local authorities
- SEWA or support agencies should ensure that these disposal sites: (a) are not located within designated forest areas or Natural Habitat areas; (b) do not impact natural drainage
courses - under no circumstances shall these wastes be disposed-off in environmentally sensitive areas. In the event of any unintended / uninformed waste deposition in nearby premises or sensitive areas, SEWA shall arrange to immediately remove such wastes and restore the affected area to its original state to the satisfaction of concerned agencies and local communities.

**E-waste**
Electronic waste (e-waste) refers to broken or obsolete electronic components and materials. E-waste materials may be valuable and recyclable, such as random-access memory and reusable laptops. However, hazardous materials, such as cathode ray tube monitors, require special handling in disposal. Common discarded electronic products include computers, televisions, stereos, copiers and fax machines. An electronic item is considered end-of-life (EOL) once it becomes non-functional and beyond economic repair, or once the technology becomes so outdated that the item is no longer eligible for resell. E-waste shall be disposed in line with the E-waste (Management) Rules, 2016 and further E-Waste (Management) Amendment Rules, 2018. These rules are based on extended producer responsibility (EPR), a popular framework across the world for e-waste management. EPR makes manufacturers of electronic products responsible for the end-of-life management of their products. They have to set up collection centres and ensure that waste is recycled and disposed of in an environment-friendly manner. All collection centres, dismantling units and recyclers must register with state pollution control boards and comply with their norms.

Under this project, SEWA intends to purchase around 60 computers (laptops and desktops), more than 400 tablets, near around 50 smart phones, 440 mobile printers / printers, and around 75 networking units/ peripheral including conference units. These are included under the e-waste rules as IT and telecommunication equipment and consumer electrical and electronics.

SEWA’s E-Waste Management initiative is presented in the box below:

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### SEWA’s e-waste initiative

SEWA’s e-waste initiative was launched in 2012 as part of a programme supported by GIZ and Microsoft. SEWA has been working with waste picker women for many decades through initiatives that include organizing, capacity building, facilitating enterprises for income increases, and several others. SEWA has since continued the e-waste initiative and has been able to gradually scale up activities. Key aspects of this initiative are as follows:

- **SEWA organizes awareness campaigns to orient women on the adverse impact e-waste can create on the environment as well as their health, if it is not collected and treated appropriately. Women are also informed that there are vendors who purchase such waste at prices better than those offered by general waste / scrap buyers. SEWA has conducted such awareness campaigns in schools and colleges as well.**

- **Under the GIZ / Microsoft supported programme, SEWA set up a system for e-waste collection, wherein e-waste from Ahmedabad and districts in Gujarat was collected at Ahmedabad, and then sold to registered recyclers such as Tes-Amman in Chennai. Currently, SEWA has an MoU with Karo Sambhav, an organization providing solutions for e-waste disposal. Karo Sambhav purchases e-waste from SEWA and then goes on to segregate and sell it to relevant manufacturers such as Dell, Apple etc.**

Under the proposed JSDF project, SEWA will expand this initiative to all target states and districts.

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SEWA shall:

- Buy products from vendors who take back e-waste after end-of-life as per CPCB norms, as part of EPR and use a certified recycler for E-Wastes. Purchase equipment from Producers who provide information on the implementation of Deposit Refund Scheme to ensure collection of end-of-life products and their channelization to authorised dismantlers or recyclers, if such scheme is included in the Extended Producer Responsibility Plan. The preferred producers / manufacturers shall confirm to Reduction of Hazardous Substances (RoHS) provision as per e-waste rules. Provided that the producer shall refund the deposit amount that has been taken from the consumer or bulk consumer at the time of sale, along with interest at the prevalent rate for the period of the deposit at the time of take back of the end-of-life product. Many manufacturers of electronics and electrical equipment including mobile companies offer take back at end-of-life. SEWA shall check the EPR Plan in Form1 of the manufacturer and their tie-up with Treatment, Storage, Disposal Facilities (TSDFs), permits / licences, and authorisation Copy of authorisation issued by the SPCBs/PCCs earlier under E-Waste (Management & Handling) Rules, 2011 in case of those producers who are operating in the country prior to 01-10-2016.

- Ensure that e-waste generated by them is channelized to authorized collection centre(s) or registered dismantler(s) or recycler(s) or is returned to the pick-up or take back services provided by the producers (to take to authorised dismantler or recycler). Transport of E-Waste should be carried out as per the manifest system as per the provisions made in rule 19 of the E-Waste (M) Rules, 2016 and the transporter will be required to carry a document (three copies) as per form 6 of the rules provided by the sender. The responsibility of safe transportation of E-waste shall be with the sender of E-Waste, as per E-Waste Rules. SEWA shall arrange safe storage receptacles for e-waste at all its training centres and head office for safe storage of end-of-life products, as per e-waste rules. Collection centres may be available in areas near SEWA head office or training centres). Suitable agreement shall be made with the producer / manufacturer or collection centre for safe collection / disposal of equipment at end-of-life. Storage of end of life products may be done in a manner which does not lead to breakage of these products and safe to workers handling.

- Consumers or bulk consumers (in this case, SEWA) of electrical and electronic equipment listed in Schedule I of E-Waste Rules 2016, shall ensure that such end-of-life electrical and electronic equipment are not admixed with e-waste containing radioactive material as covered under the provisions of the Atomic Energy Act, 1962 (33 of 1962) and rules made there under; bulk consumers of electrical and electronic equipment listed in Schedule I shall file annual returns in Form-3, to the concerned State Pollution Control Board on or before the 30th day of June following the financial year to which that return relates. In case of the bulk consumer with multiple offices in a State, one annual return combining information from all the offices shall be filed to the concerned State Pollution Control Board on or before the 30th day of June following the financial year to which that return relates.

- SEWA shall arrange safe storage receptacles for e-waste at all its training centres and head office for safe storage of end-of-life products, as per e-waste rules. Collection centres may be available in areas near SEWA head office or training centres). Suitable agreement shall be made with the producer / manufacturer or collection centre for safe collection / disposal of equipment at end-of-life. Storage of end of life products may be done in a manner which does not lead to breakage of these products and safe to workers handling.

5 Examples: Samsung adopt eco-friendly innovations and practices. Acting responsibly towards the environment, Samsung has pledged to recycle electronic items, such as TV, refrigerator, washing machine and mobiles etc. that are no longer useful. ‘Samsung Take-back And Recycling’ (STAR) program is an initiative towards leading a more conscious life and taking an aware step towards conservation and optimization of resources.
such products. The storage area should be covered and have fire protection system in place.

- Storage can be for a period of 180 days and SEWA shall maintain record of collection, sale, transfer and storage of wastes and the records shall be made available for inspection (such storage may be extended for up to 365 days, in case the waste need to be specifically stored for development of a process for its recycling or reuse.
4. Institutional Capacity for Environmental and Social Impact Management

4.1. Overall Institutional Responsibility

SEWA will have direct responsibility for management, administration and coordination of project activities. SEWA will be responsible for administering the project funds, commissioning technical assistance and capacity building activities, establishing partnerships and implementing other planned activities to realize project development objectives. SEWA will enter into agreements with SEWA state-level chapters or identified partner organizations in states other than Gujarat and Rajasthan. While these partner organizations are pre-identified and have been SEWA implementation partners in earlier SEWA-JSDF projects, their selection will take place during project implementation according to Bank’s guidelines.

SEWA shall put in place a strong project management team to spearhead and monitor implementation of project activities. This include: a dedicated Project Manager, Finance Manager, Procurement Specialist, Safeguards Officer, Digital Lead and an M&E Specialist. SEWA's project managers are familiar with and trained in the World Bank’s fiduciary systems as well as project monitoring processes. However, their exposure to World Bank safeguards policies is limited; though they are aware of environmental aspects and impacts through their other works. At each centre, there is an office to coordinate the activities and these offices serve as hub for providing services to the nearby areas in the vicinity of 15 to 20 kms. One of the team members, who would possess more experience or capacity in this regard will be designated to maintain the needed records on ECoP compliances.

4.2. Safeguards Management

Safeguards Officer at Project Management Unit would:
1. Co-ordinate with Project Teams on Environmental Aspects right from Project Initiation
2. Identify and Provide adequate training to nominated Staff / Office - in - charge; also to look at Environmental Aspects during Implementation and Operation Stages
3. Ensuring that the ECOPs will be incorporated in the bidding documents / Vendors Responsibilities
4. Monitor compliance to ECoPs and Report to the Project Manager

Considering the need to effective safeguards management in this project, suitable training for would be arranged for the Nodal Officer at each SEWA Touch Point, by the Safeguards Officer of the Project Management Team.

4.3. Disclosure of EECoP

The ECoP is a document subject to public disclosure and consultation.

The entire document has been written in consultation with the teams (national and state) of SEWA and its vendors. In the month of October, site visits and meetings with various teams were organised to conduct an environmental assessment. Other stakeholders like CLBRC / CLC officials, vendors and beneficiaries were also consulted. During these consultations, the
respondents shared how they are involved in the program, their role, the impact and the suggestions to address project related impacts if any. Based on the consultations and feedback received, the report was revised for draft disclosure. The details of persons consulted is available as Annex I.

Comments are invited from on Draft ECoP after disclosing the same. Full report in English and Executive Summary translated to Hindi were disclosed on SEWA website on First Week of November 2018. The document was available online for two weeks and the information was circulated to all stakeholders of SEWA to invite comments. Comments are invited from on Draft ECoP after disclosing the same. Full report in English and Executive Summary translated to Hindi were disclosed on SEWA website on First Week of November 2018. The document was available online for two weeks and the information was circulated to all stakeholders of SEWA to invite comments. Comments were incorporated and the Final Report was prepared. The World Bank website also disclosed the document with a link of IA website (after receiving No Objection Certificate (NOC) for its disclosure) after necessary approvals; as per disclosure policy.
## Annex I: List of Stakeholders Consulted

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<th>Location</th>
<th>Designation/Department</th>
<th>Name</th>
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