# SOCIAL IMPACT ASSESSMENT FINAL REPORT OF

# Land Acquisition For a Adivaram 110 KV Substation In

# Engappuzha Village,

# Thamarassery Taluk, Kozhikode District.



Submitted to **The District Collector, Kozhikode** 

By Don Bosco Arts and Science College Angadikadavu, Kannur www.donbosco.ac.in

17 April 2023

#### DECLARATION

Kozhokode District Administration through its promulgation with File No.(File: DCKKD/6214/2022-B1, G.O.(P)No.937/2023/RD dated 15/03/2023, entrusted to Don Bosco Arts & Science College, Iritty (Kannur) the Social Impact Assessment (SIA) of the Land Acquisition for the Adivaram 110 KV substation in Engapuzha village of Thamarassery Taluk, Kozhikode District. As per the land details given by the Office of the Deputy Collector (LA) Kozhikode , Special Thahasildar (LA- Koyilandy), Kerala State Electricity Board- T C Section Pthankayam, site alignment sketch, and the guidance from the president Mrs Mini Thankachan, Puthuppadi Panchayath, Ward member:- Mrs Ayishakkutty, the SIA Team collected data from the project affected families, other affected institutions and the stakeholders of the proposed project, as soon as the college received the Intimation. The Draft report is prepared using all the information given by the affected and stakeholders, the draft report was published on 23/03/2023 and the public hearing (11/04/2023), the following report has been drawn up. The form 5 was published in 2 news papers. The supportive documents regarding the properties, have to be verified by the concerned authorities.

Director Social Impact Assessment Unit Don Bosco Arts and Science College, Iritty, Kannur

# List of Contents

Chapter :1 Executive Summary	
1.1 Project and Public Goals	06
1.2 Location	06
1.3 Size and Attributes of Land Acquisition	07
1.4 Searches for Alternatives	07
1.5 Social Impact	07
1.6 Mitigation Measures	07
1.7 Social Impact Mitigation Plan (Mitigation Measures)	08
1.8 Rehabilitation & Resettlement Measures	09
1.9 Major Suggestions by the Affected	09

# **Chapter :2 Detailed Project Description**

2.1 Background and Rationale of the Project	10
2.2 Location	10
2.3 Project Size attributes	11
2.4 Examination of Alternatives	12
2.5 The Project Construction Progress	12
2.6 Workforce Requirement	12
2.7 Need for Ancillary Infrastructural Facilities	12
2.8 Applicable Rules and Statutes	12

## Chapter :3 Team composition, Study Approach & Methodology

3	5.1 Background	14
3	5.2 SIA Team	14
3	3.3 SIA and SIMP Preparation Process	14
3	.4 Methodology and Data Collection	15
3	5.5 Site Visits and Information Gathering	17
3.	6 Details of Public Hearing	17

## Chapter :4 Valuation of Land

4.1 Background	21
4.2 Inventory list	21
4.3 Land Requirements for the Project	21

4.4 Site Sketch Plan	22
4.5 Use of Public Land	22
4.6 Land Already Purchased	22

# Chapter :5 Estimation and Enumeration

5.1 Number of Properties Affected	23
5.2 Extent Affected	23
5.3 Ownership of the Land	23
5.4 <i>Patta</i> for the Land	23
5.5 Current Use of the Affected Property	23
5.6 Details of affected land	24
5.7 Possession of any other land	24
5.8 Social category	

5.9. Family health situation

# Chapter :6 Socio- Economic Design

6.1 Preface	25
6.2 Family Details	25
6.3 Monthly Family Income	25
6.4 Effect on Family Income	25
6.5 Employment/Major Source of Income	25
6.6 Type of Ration Card	25
Chapter :7 Planning of Counter – Impact Implementation	
7.1 Approaches to Impact Mitigation	26
7.2 Methods for Negation, Mitigation and	
Compensation of the Impact	26
7.3 Measures Included in Rehabilitation and Resettlement	26
7.4 Measures Requiring Body Has Stated to	
Introduce to the Project Proposal	48
7.5 Alterations to Project Design to Reduce	
the Social Impact	27
7.6 Impact Mitigation and Management Plan	27
7.7 Measures to Avoid, Mitigate and Compensate	28
7.8 Suggestions to mitigate the Impacts	29

7.9 Willingness to give up the land	29
7.10 Do you welcome the Project	29
Chapter :8 Social Impact Action Plan Directorate	
8.1 Introduction	30
8.2 Institutional Structures & Key Persons	30
Chapter :9 Social Impact Management Budget	
And Financing of Mitigation Plan	
9.1 Costs of all Resettlement and Rehabilitation Required	31
9.2 Annual Budget and Plan of Action	31
9.3 Funding Sources with Break Up	31
Chapter :10 Social Impact Management Plan	
Monitoring & Evaluation	
10.1 Introduction	33
10.2 State Level Body	33
10.3 District Level Body	33
Chapter :11 Analysis of Costs and Benefits	
Recommendation on Acquisition	
11.1 Final Conclusion and Assessing the Aims	35
11.2 Character of Social Impact	35
11.3 Major Suggestions by the Affected	35
Summary and Conclusion	36

Annexure: 1- Govt. Orders

Annexure: 2- Alignment Sketch

Annexure: 3- List of Public Hearing Officials and Participants

Annexure: 4- Form-5 declaration in the News Paper

Annexure: 5-Questionnaire

# CHAPTER – 1 EXECUTIVE SUMMARY

#### **1.1 Project and Public Goals**

The land acquisition work is as per the RFCTLARR Act 2013 for the Adivaram 110 kv substation in Engapuzha Village of Thamarassery Taluk, Kozhikode District. The major purpose of the project is to establish a substation project for better electricity transmission and supply for the holistic growth of the region, for eliminating the poor voltage level etc Adivaram area. The total land to be acquired for the 110kv substation is about 213.5 cents. The project is for the public purpose.

#### 1.2 Location and land sketch map

the Adivaram 110 kv substation is located in ward no. 10 of the Puthuppadi village, in Thamarassery Taluk, Kozhikode District.



Location sketch map



The proposed location Map

#### 1.3 Size and Attributes of Land Acquisition

The Social Impact Assessment is for the acquisition of 213.5 cents of land from Engapuzha village, from 3 survey numbers. The land required for the proposed project is a plot of 208 cents of land from one individual and the rest is for the road to the land. Agricultural assets like Coconut, Rubber and a natural pond is affected.

#### **1.4 Searches for Alternative Route**

The study team searched for other alternative place for the project. Up on the enquiry with the affected, other stake holders, all the affected/representatives with the opinion that, the land identified by the KSEB may be the only suitable land for the 110 KV Substation. It is also learned that the spot was identified much earlier.

#### **1.5 Social Impact**

The total area of land required for the Adivaram 110kv substation in Engapuzha village is 213.5 cents from 3 survey numbers. The negative impact of the project is the 208 farm land with a pond and loss of 5.5 cents of land with rubber, coconut trees etc. It is estimated to directly affect a population of 18 (Male 11, Female 7) people. One of the affected is fully affected and 2 of them are partially affected. A comfortable compensation / rehabilitation may be enough to cure/settle completely the wound by the acquisition.

#### **1.6 Mitigation Measures**

It appears from the analysis and overview of the Act that the provisions of compensation for land

acquisition under RFCTLARR Act, 2013 will be enough to manage the social issues. Speeding up the acquisition process and disbursement of compensation is recommended.

Table No.1.2 Breakdown of Social Impact and Mitigation Steps			
Sl. No.	Type of Impact	Status: Direct/indirect	Proposed Mitigation Measure
1	Loss/damage of houses / commercial buildings	Nil	Nil
2	Wall and gate	Nil	Nil
3	Water Source	1 pond	Rehabilitation as per RFCTLARR Act, 2013
4	Loss of Livelihood	3 families are affected directly as they lose their livelihood/family income/from agriculture.	Compensation as per the RFCTLARR Act, 2013
5	Loss of public utilities	Nil	Nil
6	Religious place/ property	Nil	Nil

Note: The above data/information are arrived as per the information provided by the respondents / and the observation by the data collection team during the survey. Supporting documents need to be verified and the losses to be calculated as per the government norms.

#### 1.7 Social Impact Mitigation Plan (Mitigation Measures)

Based on the desk review, field investigations and consultations undertaken during the Social Impact Assessment of land acquisition for the Adivaram 110kv substation, the following Social Impact Mitigation Plan (SIMP) has been derived. The major mitigation measures drawn are:

#### **Economic Measure**

Loss of land, properties/assets, and agricultural assets due to acquisition of land for the project should be compensated as mandated by the RFCTLARR Act-2013, under sections 26 to 31 and in the First Schedule of the Act for the affected 358 householders / property owners. It is observed and expressed by the affected that maximum compensation at the earliest to a great extent and economic impact can be mitigated.

#### **Environmental Measures**

The proponent shall design the work eco-friendly and drainages at the site/alignment minimizing the impact on the flora and fauna of the areas. As far as possible the pond in the land should be maintained. There is rubber, coconuts and other trees in the land and as far as possible should be protected.

Table No. 1.3 Positive Impacts			
Impact	Direct/Indirect	Temporary/	Major/Minor
		Permanent	
Better electricity supply in the region with the	Direct	Permanent	Major
establishment of the substation			
Enhanced economic and industrial growth	Direct	Permanent	Major

#### Social & Religious Measures.

The proposed land for the Adivaram 110 KV substation making is not having any properties/objects of the religious/social institutions.

#### 1.8 Rehabilitation & Resettlement Measures

It appears from the analysis and overview of the Act that the provisions of compensation for land acquisition under RFCTLARR Act, 2013 will be enough to manage the social issues. Speedy disbursement of compensation is recommended. Compensation as per RFCTLARR Act will be enough to mitigate the impacts like loss of productive agricultural assets.

#### 1.9 Major Suggestions by the Affected

Following are the major suggestions and recommendations proposed by the affected to mitigate the impacts on them:

- The affected are losing their sole agricultural properties like Coconut trees and other output.
- Value calculation in par with market value
- There is fear expressed by the Panchayath ward member regarding the possibility of radiation or similar impacts from the substation which will affect the neighbours
- The compensation and the acquisition process must not be delayed.
- One of the affected who is sharing the boundary with the main land has urged to cut the trees which will affect his land and agriculture.
- Two of the affected have chronic health issues like kidney problem and cancer and hence, require humanitarian approach during the acquisition process.

# CHAPTER 2 DETAILED PROJECT DESCRIPTION

#### 2.1 Background and Rationale of the Project

The land acquisition work is as per the RFCTLARR Act 2013 for the Adivaram 110KV Substation in Engappuzha Village of Thamarassery Taluk, Kozhikode District. The major purpose of the project is to establish a substation project for better electricity transmission and supply for the holistic growth of the region, for eliminating the poor voltage level etc Adivaram area. The total land to be acquired for the 110kv substation is about 213.5 cents. The project is for the public purpose.

The total land to be acquired for the Adivaram 110KV Substation is about 213.5 centre.

#### 2.2 Location and the land sketch

The Adivaram 110 KV Substationin is in ward 10 of Puthuppadi Panchayath, Engapuzha Village of Thamarassery Taluk, Kozhikode District.



The proposed location Map of the Mini bye-pass project (The alignment sketch is given in the annex).



#### 2.3 Size and Attributes of Land Acquisition

The Social Impact Assessment is for the acquisition of 213.5 cents of land in Engapuzha village from 3 survey numbers 3 land holders. The land required for the proposed project is

agricultural land. The main site land is of 208 cents and the other two land portions are for the road to the main land. The attributes in the land include rubber, coconut trees and other tress. There is a pond in the main land. There are houses near to the acquiring land.

#### 2.4 Searches for Alternative Route

The study team searched for other alternative place for the project. Up on the enquiry with the affected, other stake holders, all the affected/representatives with the opinion that, the land identified by the KSEB may be the only suitable land for the 110 KV Substation. It is also learned that the spot was identified much earlier. The substation will take the supply from the Thamarassery-Kuthumunda transmission line.

#### 2.5 Details of environmental impacts:

The proposed substation project does not have any activity that will result in any environmental impacts. It aims at transmission of electric power from the main line. Only the concern expressed that would the electric transmission process creates any impact on the immediate neighbours. There should be proper drainage facilities to avoid any kind of water logging. There is a pond in the acquiring land it should be protected and maintained as natural.

#### 2.6 Workforce Requirement

The work force needs to be equipped with modern machineries and planned man power in various ranges in terms of skilled, semi-skilled and unskilled labours. The locals and the family members whose livelihood are affected may be given (if needed) opportunity in the construction work as a temporary relief.

#### 2.7 Need for Ancillary Infrastructural Facilities

There is a need of road to the mainland and the land is being acquired for the same.

#### 2.8 Applicable Rules and Statutes

Application of National Statutes and Regulations on socio-economic impact suggests that the Proponent has a legal duty and social responsibility to ensure that the proposed development be implemented without compromising the status of the environment, livelihood of people, natural resources, public health and safety etc. This position enhances the importance of this social impact assessment for the proposed site to provide a benchmark for its sustainable operation. The major legislation that governs the land acquisition for the present project is hereby discussed briefly:

• The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013

- The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (Kerala) Rules 2015.
- Government of Kerala Revenue Department State Policy for Compensation and Transparency in Land Acquisition.
- Right to Information Act, 2005.
- The Rights of Persons with Disabilities Act, 2016.

# Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013

The chapter IV, Section 11 of the Central Act states that 'whenever it appears to the appropriate government that land in any area is required or likely to be required for any public purpose, a notification to that effect along with details of land to be acquired shall be published in the official Gazette, two daily newspapers, uploaded on the website of appropriate government and in the affected areas to all the persons affected.' (RFCTLARR Act, sec.11). Prior to the acquisition, Section 4 of the Act mandates 'conduct of a Social Impact Assessment' study of the affected area to study the impact the project is likely to have on various components such as livelihood of affected families, public and community properties, assets and infrastructure particularly roads, public transport etc. Similarly, where land is acquired, fair compensation shall be paid promptly to all persons affected in accordance with sections 28, 29 and 30 of the Act, along the following parameters:

- Area of land acquired,
- Market value of the property decided by the Collector,
- Value of things attached to land or building
- Damages sustained from the severance of the land,
- Damages to other property in the process of acquiring the said land,
- Consequences of changing residence or place of business by the land owners,
- Damages from diminution of profits of the land acquired.
- Award of Compensation.
- Interest paid at the rate of minimum 12% per annum on such market value for the period commencing on and from the date of the publication of the notification of the social impact assessment study.

The Proponent has undertaken Social Impact Assessment and developed mitigation measures for those who will be affected by the proposed project. The Proponent shall adhere to the requirements of the Act in the implementation of land acquisition.

#### **CHAPTER 3**

# TEAM COMPOSITION, STUDY APPROACH AND METHODOLOGY

#### 3.1 Background.

Kozhikode District Administration through its promulgation with File No. DCKKD/6214/2022-B1 and with the Govt. of Kerala Gazette Notification G.O.(P)No.937/2023/RD dated 15/03/2023, entrusted to Don Bosco Arts & Science College, Iritty (Kannur) the Social Impact Assessment (SIA) of the Land Acquisition for the Adivaram 110 KV Substation in Engapuzha village of Thamaraassery Taluk, Kozhikode District. The objective of a Social Impact Assessment (SIA) is to enumerate the affected land and structures, affected families and persons to identify social impacts, and to prepare Social Impact Management Plan (SIMP). Data from primary and secondary sources have been collected to elicit the information for the current process. As part of SIA, a detailed socio-economic survey has been conducted by experienced members of the SIA unit in the affected area, meeting every affected land owners to assess the adverse impacts, measures/ suggestions to mitigate the impact and their opinion about the project.

#### 3.2 SIA Team

The SIA unit that undertook SIA study comprised of members headed by the Vice-Principal & Head of the Department of Social Work, Don Bosco Arts & Science College, Angadikadavu, affiliated to Kannur University, Kannur. The head of the team is having MBA and MSW and has wide experience in academic and development sectors. The Coordinator of the SIA unit is also with MSW and M. Phil. in Social Work with 28 years experience in research, project planning and implementation in development sector, over decades.

	Table No. 3.1 SIA Team Members		
Sl.	Name	Qualification &	Experience
No.		Designation	
1	Fr. Sojan	Director	HOD &Vice principal, with 10 years
	Pananchikal		experience in administrative,
			academic and developmental sector
2	Sebastian KV	MSW, M. PHIL	28 years experience
		Team Leader, SIA Unit	in Development Sector, Research etc.
3	Lissy Ciriac	Research Associates	MSW.
4	Nimal Thomas	Research Associates	MSW.

#### **3.3 SIA and SIMP Preparation Process**

With the help of the Deputy Collector LA, Special Tahsildar (LA) Koyilandy and staff members, KSEB –TC Section, Pathankayam Puthuppadi Panchayath President, Ward Member, and

following the alignment sketch, the study team identified the affected area and met the affected. Before starting the detailed SIA study, field visits and pilot study of the socio-economic survey were conducted. For the data collection, the affected people were administered the interview schedule and their feedbacks collected carefully. From secondary sources, an understanding of the physical, social, economic and cultural set up of the project area was obtained. Many pre-coded questions were included in the questionnaire. The survey forms duly filled in were consolidated and entered into a database, the information updated and the report prepared.

While preparing draft SIA SIMP the study team followed some essential components and steps which are (1) identification of socio-economic impacts of the projects, (2) legal frameworks for land acquisition and compensation (RFCTLARR ACT, 2013). The various steps involved in the study have been described in detail.

#### 3.4 Methodology and Data Collection

The methodology adopted for the assessment was a mix of quantitative and qualitative processes. "By using both qualitative and quantitative methodology, more comprehensive data will be obtained, and a more holistic product would result, without excluding important areas of assessment" (DEAT, 2006).

Quantitative information on the Project Affected Persons and Families were gathered through the household survey. The household interviews of the affected land holders for the SIA study area covered, 3 property holdings and their dependents who own property were contacted. Household survey was undertaken by qualified and experienced data enumerators by administering predefined interview schedules targeting the Project Affected Population (PAP). It was a very difficult task to trace the land owners who own the land/property in the alignment and settled / residing far and wide.

Qualitative information was gathered along with the field study / household survey through consultation with stakeholders. The consultations were conducted with the help of interview guides and guideline points. The SIA team developed several formats of interview methods to target various groups of stakeholders which included Project Affected People, elected representatives and representatives of various government departments. The key informant stakeholders, viz., elected representatives like Panchayath President and the ward member, revenue officials etc were contacted and relevant information collected.

During the study a number of informal consultations and discussions were conducted apart from the formal interviews and other information gathering process. Thus the respondents who have land in the project location were covered in the assessment study. The stakeholders were identified and consulted with the objective of understanding the existing socio-economic conditions of the affected area and the immediate surroundings of the proposed project.

The data obtained from the survey was analysed to provide a summary of relevant baseline information on affected populations - all types of project impacts which include direct and indirect impact of physical and or economic nature on the people and the general environment. The responses received from the community, the local administration and representatives of government departments through the public consultation and socio-economic survey are represented in the subsequent chapters of this report.



SOME STILLS FROM THE AREA AND SIA PROCESS

Guidance from Panchayath President



Deputy Collector (LA)

Deputy Tahasildaar (LA



Proposed land

#### 3.5 Site Visits and Information Gathering

From 18/03/2023 onwards the SIA team contacted the Acquisition authorities and visited the site to verify the alignment drawings and to identify the affected area. After identifying the affected areas, the SIA unit consulted with different stakeholders at the project area.

# **3.6 SUMMARY OF PUBLIC HEARING**

In connection with the land acquisition for the Adivaram 110 KV substation in Engapuzha village of Thamarassery Taluk, Kozhikode District, the public hearing as part of the SIA based on the RFCTLARR Act, for the affected landowners and the proponents including the acquisition officials was held at Puthuppadi Panchayath Hall at 11.00 am on 11<sup>th</sup> April 2023.

List of the Officials participated in the Session

	List of Officials attended		
SN	Name	Designation	Department
1	MrsMini Thankachan	Panchayath President	Puthuppadi Grama Panchayath
	Kuttikrishnan		
2	Mr. Muralidharan K.	Sple. Tahasildar (LA)	Koyilandy
3	Mr. Jamnas	Asst. Engineer	T.C. section Pathankayam, KSEB
4	Mr. Sebastian K.V	Coordinator	SIA Unit Don Bosco Arts & Science
			College

	The lisp of the affected participated						
SN	SN Name House Name Mobole Number						
1	Mr. K V Thomas	Kokkapillil	9656617130				
2	Mr. George Maria	Kalappura House	9746628853				
3	Mrs.Elsamma	Kalappura House	9746628853				
4	Mr. Thomas George	Kalappura House	9745435820				
5	Mr.Raju Scaria	Varikkamakkal, Kaippu	9446564229				

The session started at 11.00 am as the SIA Unit Coordinator made the welcome speech. The session was chaired by Mrs. Mini. Thankachan, Mr. Muralidharan Special Tahasildar (LA), Mr Jamnas A.E. TC Section Pathankayam, (KSEB) etc. were the officials attented.



Mr. K V Sebastian SIA Coordinator

With a brief welcome and introduction of the purpose of the Public hearing by the SIA Unit Coordinator Mr. K.V. Sebastian explained the findings briefly as described in the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act -RFCTLARR 2013 also briefed the process of public hearing. He urged the Panchayath president to chair the session. The affected parties who participated in the Public Hearing presented their problems and made corrections in the draft report accordingly regarding the assets and inventories.



#### Panchayath President

The Panchayath President Mrs. Mini Thankachan addressed the gathering and said that the 100 KV substation was long awaited one and setting up the substation will reduce the voltage problems in the region and bring out industrial and economic growth. She appreciated the affected for their willingness to give the land. She urged the authorities to provide maximum compensation at the earliest. The Chair invited the affected to share their grievances and concerns.



#### Major concerns and Suggestions Expressed by the affected.

The affected expressed their anguishes, doubts and opinion is given bellow:

SN	Name	Concerns and Opinion
1	K V Thomas	There is a lot of troubles awaiting after the substation start functioning
		very close to their residence. The trees in the land which is acquiring make
		difficulties for his farm and wants the KSEB to cut those trees/ branches.
		Give maximum compensation for the land.

2	Gorge Maria	We should get maximum compensation. Now the price of land is					
		increasing and we should get the benefit. Which is the route for KV line to					
		the substation? Will we lose the land for that too? Will there be radiation					
		problem from the substation? Will the acquisition take long time? The					
		land documents are in the bank.					
3	Raju Scaria	I bought this land 3 years ago. I was told that the substation project will					
		commence in 60 days and it is taking long time. Expect maximum					
		compensation.					

# **Reply and Clarifications**



The Special Tahasildar (LA) responding

Mr. Muralidharan, Special Tahasildar (LA Office) Koyilandi explained the acquisition process. The compensation will be given as per the RFCTLARR Act- 2013. About 20 old similar land registrations in the area will be selected to find the average and then add the solatium to fix the price. The assets valuation is done by the Forest department, Agriculture and the PWD for the respective items. The exact amount of compensation cannot be predicted now. The compensation will be transferred the same day or on the next day. The SIA is done to measure the loss and impacts of the land acquisition. Notice will be issued to all the affected for the acquisition procedure.



Mr. Jamnas, A. E.

Mr. Jamnas AE, (KSEB-TC section Pathankayam), responded to the queries and suggestions. KSEB has a plan to setup the project at the earliest. The supply line is from Thamarassery- Kuthumunda transmission line requires 21 metre width and the land will not be purchased. Only a right to way will be executed. There will not be any radiation from the substation.

#### **Conclusion:**

All the 3 affected expressed their willingness to give up the land and are expecting a speedy maximum compensation.

The discussion concluded around 11.50 with thanks giving by the coordinator and concluding verdict by the Chair Mrs. Mini Thankachan, Puthuppadi Panchayath President.

# CHAPTER - 4 VALUATION OF LAND

#### 4.1 Background

The Social Impact Assessment unit conducted the socio-economic survey of the families and individuals affected by the project in the alignment during the month of March 2023. It was learnt through this survey to what extent the proposed project would impact on the properties, income, livelihood etc. of each family. A pre-coded questionnaire was used for the purpose. The major goal of the survey was to assess the socio-economic structure, type of property, right to the assets, the likely impacts and their depth, details of properties etc. of the affected families. The findings of the survey and the gravity of the problems are discussed in this chapter.

#### 4.2 Area Affected by the Project

	Survey No	Extent	Village	Affected area
George Maria Kalappura	51/1A1	4.2 cent		
Thomas Kokkapilliyil	51/11	1.48 cent	Engapuzha	
Raju Scaria Varikkamakkal	51/1	208 cent		213.50 Cent

The total land for which the Social Impact Assessment is done comes to 213.5 cents from 3 survey numbers in Engapuzha village of Thamarassery Taluk, Kozhikode District. The land required for the proposed project is of 208 cents and the land for the road to the land.

	Land Requirement for the Project						
Survey No.	Extent	affected	mob	Assets affected			
51/1A1	4.2 cent	George Maria Kalappura	9746628853 9745435820	Rubber -6			
51/11	1.48 cent	Thomas Kokkapilliyil	9656617130	Arecunut tree-8, Peper-15 other trees 1			
51/1	208 cent	Raju Scaria Varikkamakkal	9446564229	Pond-1 coconut tree- 70, Arecunut tree - 30, Nutmeg-3, other trees 12, Anjili-1,			

4.4 Site Sketch Plan



#### 4.5 Use of Public Land

There in no public land in the affected area.

# 4.6 Land Already Purchased

No land has been purchased till now.

# CHAPTER - 5 ESTIMATION AND ENUMERATION

This chapter presents the livelihood affected families and the scale of impact on the affected families. It also mentions about the loss of inventory among the affected. Besides, this chapter provides an estimation of the units affected at the marked alignment in Engapuzha villages of Thamarassery Taluk in Kozhikode District.

#### 5.1 Details of Properties Affected

Details of Properties Affected					
	village	Affected are			
George Maria Kalappura	51/1A1	4.2 cent		1	
Thomas Kokkapillil	51/11	1.48 cent	Engapuzha	213.50 Cent	
Raju Scaria Varikkamakkal	51/1	208 cent			

#### 5.2 Extent Affected

Table No. 5.2 Extent Affected				
Extent Frequency				
Totally affected	1			
Partially affected	2			
Total	3			

Table No.5.2 shows the extent of land or property affected by the acquisition. 1 of the property is fully affected. 2 land holders/properties are partially affected.

#### 5.3 Ownership of the Land

The SIA study area accounting to about 213.5 cents fully privately owned.

#### 5.4 Patta for the Land/land documents

The responses of property holders reveal that among the directly affected 3 have *patta*/deed for their entire property.

#### 5.5 Current Use of the Affected Property

The use of the land affected by the acquisition: 3 landholders have agricultural assets like coconut, rubber, arecunut, and a pond

#### 5.6 Details of affected land

Land owners	Survey No.	Extent
George Maria Kalappura	51/1A1	4.2 cent
Thomas Kokkapilliyil	51/11	1.48 cent
Raju Scaria Varikkamakkal	51/1	208 cent

The table shows the details of affected land

#### 5.7 Possession of any other land

owner	Survey No.	Extent	other land
George Maria Kalappura	51/1A1	4.2 cent	No other land
Thomas Kokkapilliyil	51/11	1.48 cent	No other land
Raju Scaria Varikkamakkal	51/1	208 cent	Has other land

The details of possession of land anywhere else shows that one of them who lose the entire land has other land and two of them lose only some portion of their land.

## 5.8. Social category

All the affected belongs to general social category

## 5.9. Family health situation

Table 5.8 Chronic sickness			
Chronic sickness	No.		
Cancer	1		
Diabetic	1		
Kidney transplantation	1		

# CHAPTER – 6 SOCIO – ECONOMIC DESIGN

#### 6.1 Preface

This chapter contains the social, economic and cultural status and the peculiarities of the families in the project affected areas. Details of the population, socialisation of the people and such related information are added to this chapter.

Survey	Extent		Mob.	Male	Female	ആകെ
No.						
51/1A1	4.2 cent	George Maria	9746628853	5	3	8
		Kalappura	9745435820			
51/11	1.48 cent	Thomas Kokkapilliyil	9656617130	4	2	6
51/1	208 cent	Raju Scaria Varikkamakkal	9446564229	2	2	4

6.2 Number of Family members / Total population affected

Table No. 6.1 shows the details of family members. A total 18 members - 11 male and 7 female - from 3 families are directly affected by the acquisition.

#### 6.3 Monthly Income

Table 6.3 Monthly family income		
George Maria Kalappura	5000/-	
Thomas Kokkapilliyil	5000/-	
Raju Scaria Varikkamakkal	15000/-	

Table No. 6.2 shows the monthly income details of the land owners.

#### 6.4 Acquisition affects Income

Table No. 6.3 Affect Family Income			
Yes	3		
Total	3		

Table No.6.3 shows the Impact of acquisition on family income of the affected. All of them said their family income is affected due to the acquisition.

#### 6.5 Source of Income:

The details of major income source of the landholders show that all of them have agricultural income.

#### 6.6 Type of ration card

All the affected have APL ration card

# CHAPTER – 7 PLANNING OF COUNTER – IMPACT IMPLEMENTATION

#### 7.1 Approaches to Impact Mitigation

The social counter-impact project has been planned to reduce / mitigate the social impact caused in connection with land acquisition. Land / property owners mainly demand for satisfactory compensation. Therefore, what has been proposed as a counter-impact mitigation step is to work out the compensation as per the RFCTLARR Act-2013 for the loss of land and properties with the affected parties concerned and pay them well in advance prior to the takeover.

#### 7.2 Methods for Negation, Mitigation and Compensation of the Impact

During the SIA study the team got the feedback from the affected community that they are willing to give their land / property if a fair compensation as per the RFCTLARR Act, 2013 is given. Make the compensation payment at the appointed time as per the strict execution of RFCTLARR Act, 2013 which insists on Fair compensation, Transparency, Rehabilitation, Resettlement and other packages. All the affected are expecting a fair compensation in par with market value.

#### 7.3 Measures Included in Rehabilitation and Resettlement

Compensation as outlined in the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act 2013 shall be provided to the affected. The proponent also shall clearly and transparently uphold the provisions of the Act and disseminate the compensation for rehabilitation and resettlement packages as per the Act and as per the directions from the government that comes time to time.

- It includes the land value compensation- As per the rules
- properly and fairly assessed structured property values- Not affected
- transportation charges and rent packages Not required resettlement, rehabilitation charges
- Support services respecting the grievances of the affected As per the rules

#### 7.4 Measures Requiring Body Has Stated to Introduce to the Project Proposal

The Requiring Body need to make a separate budget to provide compensation in par with the present money value, inflation and market realities particularly in Kerala. The affected are giving up their valuables and some of them moving away for the benefit of the larger public and their sentiments / emotional attachment to the property should be considered with at most reality.

#### 7.5 Alterations to Project Design to Reduce the Social Impact

There are some suggestions or request for cutting the trees /branches on the land border and no other alterations are required/ alternate alignment in this particular site. No other changes/alteration in the alignment is suggested by the affected

#### 7.6 Impact Mitigation and Management Plan

Based on the desk review, field investigations and consultations undertaken during the social impact assessment study for the Adivaram 110KV substation Project, the following Social Impact Mitigation Plan (SIMP) has been developed to mitigate the negative social impact that may arise. The responsibility for the incorporation of mitigation measure for the project implementation lies with the district administration and the proponents. This mitigation plan is addressed to reduce negative social impact of the acquisition of about the 213.5 cents of land from Engapuzha village. The mitigation measures suggested:

Table No. 7.1 Impact Mitigation and Management plan				
Impact	Mitigation Means	Factors to be monitored	Concerned Agency	
Concern about	To formulate criteria for full	1 2	Revenue Dept.	
Inadequacy of	compensation; Criteria to be	compensation.		
Compensation	published before hand;	Number of complaints		
	To set up a Grievance	about compensation		
	Redressal system	Number of demands to		
		enhance the compensation		
Complaint about the	Finalise the amount before	Number of affected waiting	Dept. of	
delay in the payment of	handing over the land to the	for the amount even after the	Revenue	
the compensation	Project	taking over is completed		
Thamarassery-	Choose the land route with low	0	KSEB	
Kuthumunda	damages to the farmers/ less	agricultural assets /complaints		
transmission line	cultivated land			
requirement of				
additional land				
Fear of radiation /	Proper safety measures and	Proper observation of the	KSEB	
side effect from the	awareness.	safety measures		
substation				

#### **Economic Measures**

a. The most significant social impact through the implementation of the project at the present location is the loss of their property for 3 households and their dependents. Loss of property and the assets due to the project should be compensated as mandated by the RFCTLARR Act, 2013 under sections 26-31 and which are listed in the First Schedule of the Act.

b. It is suggested that during the construction phase, labour from the affected group/ nearby villages be used depending on its availability/requirement and the need of the affected and their skill.

#### **Environmental Measures**

- a. At the designing phase of the project, care should be given to design eco-friendly drainages at both sides minimizing the impact on the flora and fauna of the area.
- b. The construction plan also should include proper drainage, avoiding water logging during the monsoon.
- **c.** The pond in the acquiring is very much a matter of environmental concern; try not to harm the same

#### **Rehabilitation and Resettlement Measures**

Since the fully affected is losing only land, resettlement is not required. Those who lose their land or properties should be given adequate compensation for rehabilitation of land or property must be taken care with utmost care and the sentiments of the affected should be respected.

#### 7.7 Measures to Avoid, Mitigate and Compensate

- The Proponent should ensure that preventive measures are taken to address the sanitation and health issues of the workers particularly those who have migrated from other states to the construction sites. Proper residential and sanitation facilities are to be ensured for the migrant workers and they have to be linked to the government health facilities in the vicinity.
- The family income of 3 households/properties are affected Proper compensation must be provided for the same and link them with schemes or programs that will help them engage in new or the same livelihood even after the acquisition.
- A redressal system may be set up with representatives from Revenue Department, Panchayath and the proponent (KSEB) for the speedy settlement of the unanticipated issues that may crop up during various stages of the project as well as at the time of evacuation / demolition.

Comparing / weighing the positive against the negative impacts, it can be easily concluded that the former outweighs the latter reaffirming the project as the most inevitable and apt one for the 110 KV substation. Nevertheless, the project is justified as the negative is minimal. It is also observed by the SIA team that many of the negative impacts highlighted above can be minimized or mitigated further with appropriate and effective mitigation measures / strategies mentioned above.

## 7.8 Suggestions to mitigate the Impacts

Provide maximum compensation for the affected at the earliest.

# 7.9 Willingness to give up land

All the affected said that they are willing to give up the land.

## 7.10 Do you welcome the Project?

All the affected said that they welcome the project

# CHAPTER – 8 SOCIAL IMPACT ACTION PLAN DIRECTORATE

#### **8.1 Introduction**

Following the desk studies, field investigations and public consultations undertaken in this study, a Social Impact Mitigation Plan (SIMP) has subsequently been developed. The SIMP provides a general outlay of the social aspects, potential impacts and mitigation measures. The responsibility for the incorporation of mitigation measures for the project implementation lies with the Institutional Framework and key persons designated by the Government for the said purpose in accordance with the sub-section (1) of section 44 of the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (Central Act 30 of 2013).

#### 8.2 Institutional Structures & Key Persons

The Government of Kerala has set up a well-established institutional frame work for the implementation of social impact mitigation/management plan (SIMP) and to perform the functions under the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act 2013.

GO (Ms)No.56/2019/RD dated 14/2/2019, Thiruvanthapuram, Revenue (B) Department At state level the land Revenue Commissioner is entrusted to perform the functions designated to them in relation to RFCTLARR Act-2013.

As per the GO read above a High level Committee headed by the Chief Secretary with the following members was constructed for issuing sanction for acquisition of land and guidelines had been issued for placing proposals before the High level Committee. The guidelines specify that all proposals for Land Acquisition shall be examined in detail by the concerned Administrative Department and forward the same to Revenue Department for approval by placing before the High Level Committee and thereby issuing sanction for acquisition.

- 1. Chief Secretary Chairman
- 2. Secretary Revenue Department Member
- 3. Secretary of the Administrative Department Member
- 4.. Any Officer nominated by The Chairman may be called as a Special Invitee.

As per the same policy at the **district level a Fair Compensation, Rehabilitation and Resettlement Committee with its members as** District Collector, Administrator for resettlement and rehabilitation, Land Acquisition officer, Finance Officer, Representatives of the requiring body to take financial decisions on its behalf and Representatives of Local Self-Government Institution has been set up to undertake various functions under the Act.

The Administrator in the committee appointed in line with sub-section (l) of section 43 of Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act' 2013 (Central Act 30 of 2013), is responsible for the rehabilitation and resettlement formulation' execution and monitoring of the rehabilitation and resettlement scheme in respect of land acquisition. Government of Kerala as per G.O. (P) No. 590/2015/RD dated 11 November 2015 has appointed the Deputy Collector (Land Acquisition) in each District as the Administrator for rehabilitation and resettlement for performing the functions under the said Act and rules made there under in respect of the persons who are involuntarily displaced due to acquisition of land'

Besides, as per G. O. (P) 589/2015/RD dated 11 November 2015, has appointed the Land Revenue commissioner as the Commissioner for Rehabilitation and Resettlement in accordance with sub-section (1) of section 44 of the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (Central Act 30 of 2013), for supervising the formulation of Rehabilitation and Resettlement scheme or plans, proper implementation of the same and to carry out post-implementation of social audit.

At the district level as per G O. (P) No.649/2015/RD dated 4 December 2015, the Government of Kerala in exercise of the powers conferred by clause (g) of Section 3 of Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (Central Act 30 of 2013), r/w sub-rule (l) of rule 3 of the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement (Kerala) Rules, 2015 has appointed Special Tahasildar LA Koyilandy & Deputy Collector LA Kozhikode to perform any one or more functions of a Collector under the said Act within the area specified in column (3) thereof and authorize them, their servants and workmen to exercise the powers conferred by section 12 in respect of any land within their respective jurisdiction for the acquisition of which a notification under sub-section (l) section 11 of the above Act.

#### CHAPTER - 9

# SOCIAL IMPACT MANAGEMENT BUDGET AND FINANCING OF MITIGATION PLAN

### 9.1 Costs of all Resettlement and Rehabilitation Required

The cost is to be calculated for resettlement and rehabilitation as per the RFCTLARR Act, 2013 by the land Revenue Commissioner at the State and the District levels.

### 9.2 Annual Budget and Plan of Action

To be worked out by the land acquisition section of the Revenue Department.

#### 9.3 Funding Sources with Break Up

Not available.

# CHAPTER 10

## SOCIAL IMPACT MANAGEMENT PLAN MONITORING AND EVALUATION

#### **10.1 Introduction**

Monitoring is a long-term process which should begin from the start of the Adivaram 110KV Substation should and continue throughout the life of the project. Its purpose is to establish benchmarks so that the nature and magnitude of anticipated social impacts can be continually assessed. Monitoring involves the continuous or periodic review to determine the effectiveness of recommended mitigation measures. The types of parameters that can be monitored may include mitigation measures or design features, or actual impacts. However, other parameters, particularly those related to socioeconomic and ecological issues can only be effectively assessed over a more prolonged period of say 3 to 5 years.

The government of Kerala in accordance with the State Policy for Compensation and Transparency in Land Acquisition frame in connection with the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (Central Act 30 of 2013), has established district and state level mechanisms for reporting and monitoring the land acquisition process and the implementation of various social mitigation measures. It includes the following:

#### 10.2 State Level Body

At the state level as per G. O. (P) M. 589/2015/RD dated 11 November 2015, *the Land Revenue commissioner appointed as the Commissioner for Rehabilitation and Resettlement* in accordance with sub-section (1) of section 44 of the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (Central Act 30 of 2013), is responsible for supervising the formulation of Rehabilitation and Resettlement scheme or plans, proper implementation of the same and to carry out post-implementation of social audit.

#### **10.3 District Level Body**

At the district level, the **Administrator** appointed in line with sub-section (1) of section 43 of Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act' 2013 (Central Act 30 of 2013), is responsible for the rehabilitation and resettlement formulation' execution and monitoring of the rehabilitation and resettlement scheme in respect of land acquisition.

Government of Kerala as per G.O. (P) M. No. 590/2015/RD dated 11 November 2015 has appointed the Deputy Collector (Land Acquisition) of Kozhikode District as the Administrator for rehabilitation and resettlement for performing the functions under the said Act and Rules made there under in respect of the persons who are involuntarily displaced due to acquisition of land'

Besides, the *Fair Compensation, Rehabilitation and Resettlement Committee at the district level* and *Land Revenue Commissioner* is authorized to ensure finalization, implementation and monitoring of the compensation, rehabilitation & resettlement package and mitigation measures.

The District level committee is expected to finalize the fair and reasonable price of land and compensation along with the Rehabilitation and Resettlement package to be given to the affected person/family. The committee shall ensure that eligible affected family is given Rehabilitation & Resettlement as envisaged in the second and third schedule of the Act.

The state level empowered committee is expected to approve or return the estimate prepared and submitted by the District level Fair Compensation, Resettlement and Rehabilitation Committee with suggestions/observations.

#### **CHAPTER 11**

# ANALYSIS OF COSTS AND BENEFITS RECOMMENDATION ON ACQUISITION

#### 11.1 Final Conclusion and Assessing the Aims

The proposed Adivaram 110KV Substation project will put an end to the ever increasing and continuous voltage issues and electric supply problems in the region. Considering the enormous inconvenience to the small industries and institutions which require minimum voltage level and nonstop supply will come to an end and boost up further growth and progress. Basically Thamarassery Thaluk is rural and hilly area and there is scope for growth and development if basic infrastructures like regular and sufficient electricity supply system. So the 110KV Substation and other related infrastructure also needs to be developed.

#### **11.2 Character of Social Impacts**

The affected people of the area face few difficulties due to the implementation of the project. The land which is set to acquire have agricultural assets and a water source. Loss of agriculture and their land will cause loss of income. The location is a farm land and residential area. A large electricity transmission unit-substation will have its own disadvantages to the nearest residents directly or indirectly. People have an anguish about radiation/side impacts. The families expressed the concern that, for the acquisition they need to get fair compensation, considering the loss of livelihood and income.

Since the project is treated as 'framed for a public purpose' under RFCTLARR Act- 2013, the people of the area should feel secure and through this Act, they need to get fair compensation. If all the authorities and people of the project area work together, the implementation of the project will be successful. Considering the public advantage, interest and treating it as inevitable, the project needs to be implemented.

#### 11.3 Major Suggestions by the Affected

Following are the major suggestions and recommendations proposed by the affected to mitigate the impacts on them:

- The affected are losing their sole agricultural properties like Coconut trees and other output.
- Value calculation in par with market value

- There is fear expressed by the Panchayath ward member regarding the possibility of radiation or similar impacts from the substation which will affect the neighbours.
- The compensation and the acquisition process must not be delayed.
- One of the affected who is sharing the boundary with the main land has urged to cut the trees which will affect his land and agriculture.
- Two of the affected have chronic health issues like kidney problem and cancer and hence, require humanitarian approach during the acquisition process.

#### **SUMMARY & CONCLUSION**

The Adivaram 110KV substation project is for a public purpose and will be a milestone in the path towards a permanent solution to the voltage issues and proper and regular electricity supply in the region. The project will enable an overall infrastructural development and economic growth in the area. The SIA for the land acquisition for the proposed project involves acquisition of about 213.5 cents of land in 3 survey numbers from 3 landholdings. The Project is aimed at public utility and the alternate is not required. The affected have expressed their willingness to give land for the acquisition expecting a fair compensation (market value). This study report helps the affected people to receive fare compensation as per the RFCTLARR Act 2013.

To execute this project, many people need to sacrifice and give away some portions of their properties. As part of land acquisition for this project, people of that area lose land with agricultural assets and a pond- water source. According to the Right to Fair Compensation, Transparency in Land Acquisition, Rehabilitation, Resettlement Act 2013, the people of this area need to get fair compensation. For this, the team has studied the social impact on the area and proposed methods to reduce the negative impact.

When we explore the positive impacts with long term goal of the project, it is necessary to acquire land for the Adivaram 110 KV Substation project and implement the project. Provisions of compensation for the land acquisition under the RFCTLARR Act- 2013 are enough to mitigate the impact of the loss of land/property and livelihood.

\*\*\*\*\*\*



ഞൽ റോഡ് ചെയർമാൻ ച്ചി കെ ബിത്വ ജോഷില അശ്വ തി സന്വജ് ,സി മോഹനസ്, പി (שובע מתאמטריים (וחומות รู้ คลามชื่อเลริกาส สถาบร कक बाठवार डोडी अगुवर्ष क्वांगी വര് സംസാരിച്ചു allan

രം നഗരസഭയിലെ ചോല കടുക്കേജൽ റോഡ് നഗരസഭ

ന്ദ്രേഷ കിടി ബാലു ഉർപ്പാടനം ചെയ്യുന്നു

# ാൽ സംഗമം altriano priveo

ാഡ് ഉദ്ഘാടനം

് നഗരസഭയിലെ പണിന

(สะเอณต เลล์การะโยโปมา

and considere used Symmetry Care concept to the second s

neemanowed asmo റ മൊൽ സംഗമം കു കാള ഇസ്ലാഹി സെ it would what സിസ് ഉദ്ഘാടനം

ലഫി (ബുറൈദ) മു ം നിർവഹിച്ചു. കൊ

Annala parate www.

ഭാരവാഹിക്യായ വികെ ക

ബർർ, നൽബ് സലഹി വിസ്വാം യ്യത്ത് ഭാരവാഹികളായ സി.പി ามาระหา้าร้ อาการสาร์ สามาร อาการีกร้ ഹബിബ് റഹ്മാൻ, മുഹ്തി താഹി ർ എന്നിവർ സംസാരിച്ചു.

ടിയത്തുർ മണ്ഡലം പ്രസിഡന്റ് ജ മാൽ ചെറുവാടി അധ്യക്ഷത വ

ന് പ്രകാസ്യമായ എം.ജ്. നി മാത്യ വി.വി. അക്കാം സമ്മം അശ്വെപ്, തി.ഹാംബ് ഞെട്ടിലെ മ്യ. പി.മെ, തിഹാംബ് എന്നിവ

AF ST DEL

Refectment b

autrications in the second sec the follow solution of any യർമാൻ എം.ടി അയ്യാണ് ഖാൻ aliqueneuse) Geleventin Data on and allshap stoop െകപി ചാന്തി അധ്യക്ഷത വഹി

nudara mrasaud

5V 141 5V11 5V1

പ്രവ്വത്തി ഉദ്ഘാടനം

ഹികളായ വിസി അണ്ണായ് രണ് ർ. ഉന്നൂറൻ പി.ചെസ്സ പി.കെ. യ ເວລາຍີດ ໄດ້ເປັນເຮັດ ເປັນເຮັດແລະ ເບັນເຫຼັງ ເຊິ່ມແລະ ແລະເຫັນເຫຼົາຍາຍາ and and alles so and ເບກະບານ ອິນາທິກາຊູລ ແຮ່ລາວລ ມີເທ stall

aligne monthly

Director, Social Impact Assessment Unit

213.50 OTTAN

mananagajai -pasmijastaj (Patric Hearing) autors 5 alasmounts
Situati 2 20023
Sectors 5 alasmounts
Secto manoou 5 alexano-uma

cent intervention of the section of the left of the section of the left of the CE A (Julian)

orner analytic



ea Beag vito vioramot Bos uq evo eguq Boarjeluuledt

ageomotion ageomotion as to be all and a set of the set പ്രത്തിലേം നിന്നും പ്രത്യായ പ്രത്യായം ഹയ്യായ പ്രത്യായ പ്രത്യാം പ്രത്യാം പ്രത്യായ പ്രത്യാം പ്രത്ത്രം പ്രത്യാം പ്രത്യം പ്രത്യം പ്രത്യം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്യം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്രം പ്രതം പ്രത്യം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രതം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രതം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ്രത്തം പ പ്രത്തം പ

38