

Islamic Republic of Pakistan

KHYBER PAKHTUNKHWA RURAL ACCESSIBILITY PROGRAM

Environmental and Social Commitment Plan (ESCP)

March 2022

Government of Pakistan
Khyber Pakhtunkhwa Rural Accessibility Program (KPRAP):P177069

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Khyber Pakhtunkhwa (GoKP) will implement the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP) with the involvement of the Communication and Works Department, as set out in the Loan Agreement. The International Development Association [World Bank], has agreed to provide financing for the Project, as set out in the referred agreement(s).
2. The GoKP shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Loan Agreement Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the GoKP shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESSs, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement with the World Bank.
4. As agreed by the World Bank and the GoKP this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the GoKP through CWD and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the GoKP through Project Director (PD) of CWD. The GoKP/CWD shall promptly disclose the updated ESCP.

Material Measures and Actions		Timeframe	Responsible Entity/Authority
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s). The E&S updates can be included in the monthly project progress report.</p>	Submit monthly ESHS updates to the World Bank throughout Project implementation, commencing after the Effectiveness Date. Submit each report to the World Bank after the end of each reporting period.	Project Director (PD), Environment and Social (E&S) Specialists in the ESMU of the Project.
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	Notify the Bank within 48 hours after learning of the incident or accident and provide the Bank a subsequent report on the details of the incident and actions taken as requested by the World Bank.	PD and E&S Specialists at ESMU
ES	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the World Bank</p>	Submit the monthly reports to the World Bank as annexes to the reports to be submitted under action A above.	PD and E&S Specialists at ESMU

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an Environmental and Social Management Unit (ESMU) with relevant qualified staff and resources to support management of ESHS risks and impacts of the Project. The ESMU will be supported by a Design and Supervision (D&S) Consulting firm. The GoKP has hired individual consultants to work with the respective team members as a stop gap arrangement till the completion of hiring process of a D&S firm.</p>	<p>Hire the identified positions no later than 6 months of the project effectiveness date, and thereafter maintain these positions throughout Project implementation.</p>	CWD
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>Subprojects will be screened following the procedure in the ESMF. Site specific ESIA/ESMPs and related instruments will be prepared for all subprojects based on the findings of the screening</p> <p>Adopt and implement site specific corresponding Environmental and Social Management Plans (ESMPs) for all subprojects, consistent with the relevant ESSs.</p>	<p>Adopt the ESMF before initiation of project activities, thereafter implement the ESMF throughout Project implementation.</p> <p>Adopt the ESIA/ ESMPs prior to the award of construction contract, and thereafter implement the ESIA and ESMPs throughout Project implementation.</p>	PD and ESMU
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>These requirements include, inter alia:</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	PD and ESMU CoC

	<ul style="list-style-type: none"> • The Contractor/Bidder will propose an ESHS specialist as the Contractor’s Key Personnel at the Site. • All Contractors/Bidders will submit and then implement the code of conducts that will apply to the Contractor’s employees and subcontractors. • All Contractors will be required to submit for approval and subsequently implement a Contractor’s Environment and Social Management Plan (C-ESMP). • All contractors will be required to comply with the ESHS specifications of their respective contracts and prepare Solid Waste Management Plan, Traffic Management Plan, OHS Plan, Security Plan, and the Physical Cultural Resources Management Plan. <p>The Contractors/Bidders shall submit a Forced Labor Performance Declaration (which covers past performance), and a Forced Labor Declaration (which covers future commitments to prevent, monitor and report on any forced labor, cascading the requirements to their own sub-contractors and suppliers).</p>		
<p>1.4</p>	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the trainings, particularly on-site trainings on all the project and subprojects are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the relevant ESSs and plans submitted by the contractors. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>PD and ESMU</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>			
<p>2.1</p>	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>Adopt prior to involvement of project workers and maintain throughout Implementation throughout the Project</p>	<p>PD and ESMU</p>

2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. Grievance mechanism will be responsive to Occupational Health and Safety (OHS) and SEA/SH complaints as well.	Establish grievance mechanism prior to the involvement of project workers, and thereafter maintain throughout Project implementation.	PD and ESMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3, for which guidelines and a WMP outline are provided in the ESMF	Adopt the WMP prior to the mobilization of construction contractor, and thereafter implement the WMP throughout Project implementation.	PD and ESMU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Implement and/or cause the contractors to implement resource efficiency and pollution prevention and management measures described in the ESMP prepared under action 1.2 above.	Adopt the resource efficiency and pollution prevention and management measures prior to the mobilization of construction contractors, and thereafter implement them throughout Project implementation.	PD and ESMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMF and ESMPs to be prepared under action 1.2 above and prepare a traffic management plan as outlined in the ESMF.	Prior to the mobilization of construction contractors and start of the site activities including material/equipment delivery.	PD and ESMU
4.2	COMMUNITY HEALTH AND SAFETY Implement and/or cause the contractors to implement community health and safety measures as described in the ESMPs prepared in accordance with the ESMF under action 1.2 and Contractor's ESMP.	Prior to the mobilization of construction contractors and start of the site activities including material/equipment delivery.	PD and ESMU
4.3	GBV AND SEA RISKS	Adopt the GBV Action Plan prior to implementation of project	PD and ESMU

	Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH in the context of construction activities and the provision of transport services to women and girls.	activities, and thereafter implement the SEA/SH Action Plan throughout Project implementation].	
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the Security Management Plan outlined in the ESMF, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p> <p>Additional security assessments will be carried out during project implementation.</p>	<p>Prior to engaging construction contractors and thereafter implemented throughout Project implementation.</p> <p>Prior to contractor mobilization</p>	PD and ESMU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>Adopt and implement the Resettlement Framework (RF) for the Project, consistent with ESS5.</p>	Adopt the RF prior to engaging construction contractors and thereafter implement the RF throughout Project implementation.	PD and ESMU
5.2	<p>RESETTLEMENT PLANS:</p> <p>Adopt and implement subproject-specific resettlement plans (RPs) for each activity under the Project for which the RF requires such RP as set out in the RF, and consistent with ESS5.</p>	Adopt and implement the respective RP, before taking possession of the land and related assets, ensuring that full compensation has been provided and [as applicable] displaced people have been resettled and moving allowances have been provided.	PD and ESMU
5.3	<p>GRIEVANCE MECHANISM</p> <p>Establish a Grievance Redress Mechanism (GRM) to address the concerns and grievances of project affected persons and other stakeholders.</p>	Prior to the commencement of project activities and then maintained throughout the life of the project	<p>PD and ESMU</p> <p>GRM Focal Points</p>

	A three-tier GRM has been proposed to provide a time-bound, early, transparent and fair resolution for APs' and other stakeholders' grievances regarding environmental and social (E&S) management of each subproject, including any resettlement issues. Handle grievances related to gender-based violence (GBV/SEA/SH) as a separate category within the GRM system.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement mitigation and prevention measures related to avifauna and aquatic biological resources included in site-specific ESMPs to be prepared under Action 1.2 and consistent with ESS6. Prepare a biodiversity assessment including critical habitat screening for the roads which go through forest areas/wetlands etc.	Throughout Project implementation	PD and ESMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES FRAMEWORK Prepare and implement an Indigenous Peoples Planning Framework (IPPF) for the Project consistent with ESS7. IPPF guidelines and an outline are provided in the ESMF.	Maintained throughout implementation and reported bi-annually.	PD and ESMU
7.2	INDIGENOUS PEOPLES PLAN Prepare and implement an Indigenous Peoples Plan (IPP) [for each activity under the Project that requires such an IPP as set out in the IPPF, and consistent with ESS7.	Adopt the IPP prior to the carrying out of any activity that requires the preparation of such IPP. Once adopted, implement the respective IPP throughout Project implementation.]	PD and ESMU
7.3	GRIEVANCE MECHANISM A three tiered GRM is outlined in the SEP <ul style="list-style-type: none"> Community GRM – to handle grievances from local communities and beneficiaries as directed by the SEP 	Adopt prior to the commencement of project activities and through the project implementation.	ESMU GRM Focal Points

	<ul style="list-style-type: none"> Project staff GRM – for handling grievances raised by project workers, including direct and indirect workers, as directed by the LMP GBV and SEA/SH GRM – as per the requirements of the GBV Action Plan 		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8</p>	Adopt the CHMP prior to the carrying out of any activity that requires the preparation of such a CHMP. Once adopted, implement the respective CHMP throughout Project implementation	PD and ESMU
8.2	<p>CHANCE FINDS</p> <p>If a risk of damaging physical cultural resources is determined, the contractor shall prepare a detailed Physical Cultural Resources Management Plan (PCRMP) which will include chance-find procedures.</p>	Subprojects will be screened for the presence of physical cultural resources prior to commencement of construction work. Implement the procedures throughout Project implementation.	PD and ESMU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	SEP has been prepared and disclosed prior to appraisal. Implement the SEP throughout project implementation and report bi-annually.	PD and ESMU

10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. Conduct periodic evaluation of the CMS to ensure that the GRM remains transparent, effective and inclusive, and also involves project workers</p>	<p>Establish the grievance mechanism prior to commencement of project activities and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>PD and ESMU</p>
Capacity Support			
Training to be provided		Targeted Groups and Timeframe for Delivery	Responsible Entity
<p>Training may be required for ESMU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> • stakeholder mapping and engagement • specific aspects of environmental and social assessment • emergency preparedness and response • community health and safety. • General environmental and socio-economic awareness • Environmental and social sensitivity of the Project influence area • Community and occupational health and safety aspects and key risks including Covid-19 response • Risks hazards assessments • Implementation requirements of OHS Management Plans • World Bank ESF requirements • National/Provincial regulatory requirements • Implementation of ESIA and ESMP • Grievance redressal mechanism • Environmental and Social monitoring and supervision 		<p>First round of trainings to be completed within first six months of designation of E&S Focal Points; Annual refresher on each throughout Project implementation</p>	<p>PD and E&S Specialists at ESMU</p>

<ul style="list-style-type: none"> • Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment • Labor management • Waste Management and Disposal • Management of waste and hazardous substances • Security management • Documentation and reporting. • 		
<p>Trainings for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p> <ul style="list-style-type: none"> • E&S issues associated with the construction works and their reporting • ESMP requirements of the contractors • Worker’s health and safety • World Bank ESF requirements • Grievance redressal mechanism • Community and occupational health and safety aspects including Covid-19 response • Housekeeping, hygiene and waste disposal, pollution prevention and control • Management of hazardous substances • Traffic safety • Emergency response preparedness • Code of Conduct • Labor management • Disability inclusion • Gender sensitivity • Security management • Mitigation against SEA, SH. 	<p>First round of trainings to be completed within first six months of designation of E&S Focal Points; Annual refresher on each throughout Project implementation</p>	<p>Contractor</p>