ISLAMIC REPUBLIC OF PAKISTAN

Project Implementation Unit- KPRAP Communication and Works Department (CWD), Government of Khyber Pakhtunkhwa (GoKP)

Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP) Additional financing P177069

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Updated Version

February 2025

KHYBER PAKHTUNKHWA RURAL ACCESSIBILITY PROJECT (KPRAP) ADDITIONAL FINANCING

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

- 1. The Government of Khyber Pakhtunkhwa (GoKP), in collaboration with the Communication and Works Department, is implementing the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP), as per the Loan Agreement (P177069). The International Development Association [World Bank], is providing the financing for this Project, as set out in the above 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 updated Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank, will be part of the loan agreement.
- 3. The updated version will be a part of the Loan Agreement Unless otherwise defined in ESCP, and the capitalized terms used in this updated ESCP have the meanings ascribed to them in the referred agreement (P177069) or any other agreement made for the additional financing.
- 4. Without limitation to the foregoing, this updated 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 updated ESCP also sets out the environmental and social (E&S) instruments that has been adopted in the said loan and shall also be adopted and implemented under the Additional Financing 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 especially for the additional financing, said E&S instruments may be revised (if required) from time to time with prior written agreement with the World Bank.
- 5. As agreed by the World Bank and the GoKP this ESCP is being revised for additional financing, 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 has agreed 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 for the additional financing.

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
IIV	IPLEMENTATION ARRANGEMENTS AND CAPACITY	SUPPORT	
A	 ORGANIZATIONAL STRUCTURE Effectively operate the existing Environmental and Social Management Unit (ESMU) in PIU-KPRAP with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including; Environment & Social Expert, Gender Expert and OHS experts for E&S management. The ESMU will be supported by Project Administration, Contract Administration, Construction Supervision (PACACS) Consulting firm. 	Effectively maintain the ESMU throughout Project implementation.	• CWD
MON	 CAPACITY BUILDING PLAN/MEASURES Prepare and implement the capacity building measures, including but limited to: Training for PIU, PACACSC and Contractors staff, stakeholders, communities, Project workers on ESHS and OHS implementation, GBV/SEA/SH issues, emergency preparedness and response, community health and safety. TORING AND REPORTING 	Within a year of project commencement	 Project Director (PD) of PIU KPRAP & ESMU E&S Specialist in PACACSC For gender related issues, an independent GBV firm (already has been hired).
С	REGULAR REPORTING Prepare and submit to the World Bank monitoring reports on the environmental, social, health and safety (ESHS) and gender performance of the Project, including but not limited to; Status of preparation and implementation of E&S	Submit monthly ESHS updates to the World Bank throughout Project implementation in the form of Project Monthly progress reports commencing after	KPŘAP `´´

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
	 documents required under the ESCP. Summary of stakeholder engagement activities carried out as per the updated Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through [quarterly] contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under Serial E below. 	the Effectiveness Dates of the AF. • Submit Bi Annual Report not later than 15 th Jan and 15 July mentioning all key points.	Specialist in the ESMU of the Project.
D	 CONTRACTORS MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the ESMP and/or a metrics specified in the respective bidding documents and contracts or as may be approved by the Engineer, and submit such reports to the World Bank. 	Submit the monthly reports to the World Bank submitted under action C above.	 Project Director (PD) of PIU KPRAP Environment and Social (E&S) Specialist in the ESMU of the Project.
Е	 INCIDENTS AND ACCIDENTS Promptly notify the World Bank of any incident or accident related to the Project/subproject 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 injuries to a worker. Promptly notify the World Bank of any incident or accident relating to the project which has, or is 	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.	 Project Director (PD) of PIU KPRAP Environment and Social (E&S) Specialist/Gender Specialist in the ESMU of the Project. E&S Specialist in PACACSC GBV firm

Material Measures and Actions	Timeframe	Responsible Entity / Authority
likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. 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. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare and agree with the World Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence. GBV/SEA/SH cases, will be referred to relevant service provider for which a GBV firm will conduct mapping exercise on district basis and will sign MoU with service providers, following agreed case management and referral procedures		
ESS 1: ASSESSMENT AND MANAGEMENT OF	ENVIRONMENTAL AND SOCIA	L RISKS AND IMPACTS

Material Measures and Actions	Timeframe	Responsible Entity / Authority
 1.1 ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Update (if required) and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. Subprojects will be screened following the procedure in the ESMF. Site specific ESMPs and related instruments will be prepared for all subprojects based on the findings of the screening. 	Adopt the ESMPs prior to the award of construction contract, and thereafter implement the ESMPs/CESMPs (as the case may be) throughout Project implementation.	 KPRAP Environment and Social (E&S) Specialist in the ESMU of the Project.
1.2 MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the updated ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct taking SEA/SH/GBV prevention consideration, 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. These requirements include, inter alia: The Contractor/Bidder will propose an ESHS specialist (or designated person as per the contract) 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.	 As part of the preparation of procurement documents and respective contracts for additional financing. Supervise contractors throughout Project implementation. 	 KPRAP Environment and Social (E&S) Specialist and Gender Specialist in the ESMU of the

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
	 All Contractors will be required to submit for approval and subsequently implement a Contractor's Environment and Social Management Plan (C-ESMP) to the Engineer or PIU. 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 and GBV action plan. 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). 		
1.3	 TECHNICAL ASSISTANCE 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. 	Throughout Project implementation.	PD and ESMUPACACSC
1.4	Training (national and international) trainings on ESMF/ESMPs are includes the Capacity Building and Project implementation manual and management arrangements.	 E&S focal in PIU and PACACSC Within a year of project commencement 	 Project Director (PD) of PIU KPRAP and ESMU Environment and Social (E&S) Specialists in PACACSC

Material Measures and Actions	Timeframe	Responsible Entity / Authority
The implementation of ESMF and Capacity Building and Project implementation manual and management arrangements in accordance with the ESSs 1 and 2 Implement the E&S provisions of the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein 1.5 ASSOCIATED FACILITIES PIU shall cause the contractors/ owner/operator of the associated facility to ensure the E&S due diligence through PACACSC Ensure that all the activities in the [camp site, batching plant site, asphalt plant and waste disposal areas etc. are carried out in accordance with the applicable requirements of this ESMPS/ESCP and the ESSs 1, including, inter alia, due diligence are in line with the ESMP, LMP, management of contractors, RAP, SEP, etc.	within 28 days of the award of the contract and before the commencement of the civil works	PD and ESMU PACACSC
 USE OF ENVIRONMENTAL AND SOCIAL FRAMEWORK implement Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. Subprojects will be screened following the procedure in the ESMF. Site specific ESMPs and related instruments will be prepared for all subprojects based on the findings of the screening. use of the ESMF of the WB during the preparation of all E&S instruments 	Adopt the ESMF prior to the award of construction contract, and thereafter implement the ESMPs/CESMPs (as the case may be) throughout Project implementation.	PD and ESMUPACACSC
1.7 COMMON APPROACH • Regular coordination with the designated E&S	As per the requirements	PD and ESMU

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
	persons of the World Bank to adopt a sustainable approach for E&S and project activities implementation		
1.8	 ACTIVITIES SUBJECT TO RETROACTIVE FINANCING For existing facilities or activities subject to retroactive financing, due diligence will be conducted, and measures set out in the ESCP/ESMPs to meet the requirements of the ESSs E&S audit, amendment to existing work contracts, or a corrective action plan shall be prepared where required. 	• 30-days after the due diligence	PD and ESMUPACACSC
	2: LABOR AND WORKING CONDITIONS		
2.1	 LABOR MANAGEMENT PROCEDURES: The Labor Management Procedures (LMP) for the Project have already been adopted, the same shall be implemented for the additional financing (AF) 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. 	Continue the effective implementation of existing packages an adopt prior to involvement of project workers for AF and maintain throughout Implementation throughout the Project	 PD and ESMU PACACSC

Material Measures and Actions	Timeframe Responsible Entity / Authority
OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Adopt and implement an OHS Management for AF to assess and manage the OHS risks impacts of the Project/subprojects. Require contractors and subcontractors for A prepare and implement OHS Manager Measures or Plan in accordance with ESMPSs relevant section of ESMF.	nd 14-days from the award of the civil works contract and thereafter implement the plan throughout Project
Adopt and operate a grievance mechanism for Project workers, as described in the LMP consistent with ESS2.	
 2.2 GRIEVANCE MECHANISM FOR PROJ WORKERS Adopt for AF and effectively operate the exist grievance mechanism for the Project work which is consistent with ESS2. Grievance mechanism will be responsive Occupational Health and Safety (OHS) SEA/SH complaints as well. 	 Adopt the grievance mechanism prior to the involvement of project workers for AF Notify the GRM requirements for new PD and ESMU PACACSC Gender Specialist of PIU

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT [The relevance of ESS3 is established during the ESA process. ESS3 may require the preparation of specific measures to cover energy, water (e.g., water balance) and raw materials use, management of air pollution, hazardous and nonhazardous wastes, chemicals and hazardous materials and pesticides (pest management plan). Depending on the project, these measures may be set out in an E&S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or as a separate measure or action. **See <u>sample actions</u> below.]**

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
3.1	MASTE MANAGEMENT PLAN Adopt for AF and effectively 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 and ESMPs/CESMP.	Adopt WMP for additional financing prior to the mobilization of construction contractor, and thereafter implement the WMP throughout Project implementation.	
3.2	 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Effectively 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. Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.6 of ESS1 above. 	Adopt the resource efficiency and pollution prevention and management measures, and thereafter implement them throughout Project implementation.	PD and ESMU PACACSC
require safety, emerg	4: COMMUNITY HEALTH AND SAFETY. The relevance the preparation of specific measures to cover community health safety of services, traffic and road safety, community exposure to hency preparedness and response, security (including engagement of e set out in an E&S document (e.g., ESMP) already mentioned in the on.	and safety risks, including, inter alia, or nealth issues, ecosystem services, mana f security personnel), and safety of dams	n infrastructure and equipment design and agement and safety of hazardous materials, . Depending on the project, these measures
4.1	 TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMF and ESMPs/ CESMPs to be prepared under action 1.1 and 1.2 above and prepare a traffic management plan as outlined in the ESMF. 	Prior to the mobilization of construction contractors for AF and start of the site activities including material/equipment delivery.	PD and ESMUPACACSC

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
4.2	 COMMUNITY HEALTH AND SAFETY Effectively 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 1.1 and Contractor's ESMP 1.2 above. 	 Prior to the mobilization of construction contractors and start of the site activities including material/equipment delivery. 	PD and ESMUPACACSC
4.3	 GBV AND SEA RISKS Adopt for AF and implement SEA/SH Action Plan to assess and manage the risks of SEA and SH in the context of construction activities and the provision of project and subprojects of all components. 	 Adopt for AF and implement the GBV Action Plan prior to implementation of project activities, and thereafter implement the SEA/SH Action Plan throughout Project implementation. 	PD and ESMUGender Specialist PIUGBV Firm
4.4	 Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project/subproject workers, sites, assets, and activities as set out in the Security Management Plan outlined in the ESMF/ESMPs, 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. Additional security assessments will be carried out 		 PD and ESMU PACACSC Construction Contractors
	during project implementation for subprojects.	mobilization	

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [The relevance of ESS5 is established during the ESA process. If resettlement documents need to be prepared (e.g., resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP.

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
5.1	RESETTLEMENT FRAMEWORK Adopt and implement the Resettlement Framework (RF) for the Project, consistent with ESS5.	Adopt the RF prior to engaging construction contractors for AF and thereafter implement the RF throughout Project implementation.	PD and ESMU PACACSC
5.2	 Adopt and implement subproject-specific resettlement plans (RPs) for each activity under the Project and subproject for which the RF requires such RP as set out in the RF, and consistent with ESS5. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RP or LRP is required], [as set out in the RPF] and consistent with ESS5. Adopt the Volunteer Land Donation (VLD) process as per the KP CWD policy where required for the project/subproject and as per VLD framework 	Adopt and implement the respective RP/VLD, 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 PACACSC PACACSC
5.3	 GRIEVANCE MECHANISM Adopt for AF and effectively Implement Grievance Redress Mechanism (GRM) to address the concerns and grievances of project affected persons and other stakeholders. A three-tier GRM has been proposed to provide a 	Prior to the commencement of project activities and then maintained throughout the life of the project	PD and ESMUGRM Focal PersonsGender Specialist of PIU
	time-bound, early, transparent and fair resolution for APs' and other stakeholders' grievances regarding environmental and social (E&S)		• PACACSC

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
	 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. 		GBV firm
relevand an E&S	: BIODIVERSITY CONSERVATION AND SUSTAINAI ce of ESS6 is established during the ESA process. As with other E document (e.g., ESMP) already mentioned in the section under E	SSs, ESS6 may require the preparation	of specific measures that may be set out in
	 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 where applicable) for the roads which go through forest areas/wetlands etc. 	implementation	PD and ESMU PACACSC PACACSC
COMM	: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN INDITIES [See examples of possible actions below that can be used paragraphs 8-10 of ESS7.]		
7.1	Not currently relevant as no project activities are expected to impact areas In which indigenous people reside	-	
of specif	: CULTURAL HERITAGE [The relevance of ESS8 is establis fic measures that may be set out in an E&S document (e.g., ESMP parate measure or action.		
8.1	CULTURAL HERITAGE RISKS AND IMPACTS	Adopt the CHMP prior to the carrying out of any activity	PD and ESMU

	Material Measures and Actions	Timeframe	Responsible Entity / Authority
	 Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP/s in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8 	that requires the preparation of such a CHMP. Once adopted, implement the respective CHMP throughout Project implementation	
8.2	 CHANCE FINDS 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. 	 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 ²	10: STAKEHOLDER ENGAGEMENT AND INFORMAT	ION DISCLOSURE	
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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.	 SEP has been prepared and disclosed prior to project appraisal, the updated SEP will be disclosed before AF. Implement the SEP throughout project implementation and report annually. 	PD and ESMUPACACSC
10.2	 PROJECT GRIEVANCE MECHANISM Adopt, publicize, maintain, and operate an accessible grievance mechanism for AF as well, to 	Adopt the grievance mechanism prior to commencement of project	= -: -

Material Measures and Actions	Timeframe	Responsible Entity / Authority
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. • The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH and any other project/subproject related 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		• PACACSC

• INDICATORS FOR IMPLEMENTATION READINESS

Capacity Support					
Training to be provided	Targeted Groups and Timeframe for Delivery	Responsible Entity			
 Training may be required for staff of and AF workers on: stakeholder mapping and engagement specific aspects of environmental and social assessment emergency preparedness and response community health and safety. Environmental and social sensitivity of the Project influence area Community and occupational health and safety aspects and key risks including dengue response 	E&S Focal Persons within the three months after mobilization; Annual refresher on each throughout Project implementation	 PD and E&S Specialists at ESMU & PACACSC Gender Specialist at PIU & GBV Firm 			

Capacity Support				
Training to be provided	Targeted Groups and Timeframe for Delivery	Responsible Entity		
 Risks hazards assessments Implementation requirements of OHS Management Plans World Bank ESF requirements National/Provincial regulatory requirements Implementation of ESIA or ESMP Grievance redressal mechanism Environmental and Social monitoring and supervision Mitigation against GBV, Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) Guidelines and protocols on GBV case management Labor management Waste Management and Disposal Management of waste and hazardous substances Security management Documentation and reporting. 				
 Trainings for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. 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 	E&S Focal Persons within the three months after mobilization; Annual refresher on each throughout Project implementation	ESMU/PACACSC/ Contractor		

Capacity Support				
Training to be provided	Targeted Groups and Timeframe for Delivery	Responsible Entity		
 Management of hazardous substances 				
Traffic safety				
Emergency response preparedness				
Code of Conduct				
Labor management				
Disability inclusion				
Gender sensitivity				
Security management				
Mitigation against SEA, SH.				