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KHYBER PAKHTUNKHWA RURAL INVESTMENT AND INSTITUTIONAL SUPPORT PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR DISTRICT OFFICES AND RESIDENCE COMPLEX GHALANAI, DISTRICT MOHMAND

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List of Acronyms

Communication & Works Department	C&W Department
Construction Contractors	CC
Contractor Environmental and Social Management Plan	CESMP
Environmental Engineer	EE
Environmental Impact Assessment	EIA
Environmental Protection Agency	EPA
Environmental Protection Ordinance	EPO
Environmental and Social Framework	ESF
Environmental and Social Management Plan	ESMP
Environmental and Social Standards	ESS
Federally Administered Tribal Area	FATA
Frontier Regions	FRs
General Environmental Assessment	GEA
Government of Khyber Pakhtunkhwa	GoKP
Government of Pakistan	GOP
Grievance Redress Mechanism	GRM
Initial Environmental Examination	IEE
Khyber Pakhtunkhwa	KP
KP Rural Infrastructure and Institutional Support Project	KPRIISP
Newly Merged Districts	NMDs
National Environmental Quality Standards	NEQS
Planning & Development Department	P&D Department
Pakistan Environmental Protection Act	PEPA
Pakistan Environment Protection Agency	Pak-EPA
Personal Protective Equipment	PPEs
Project Coordination & Management Unit	PCMU
Project Director	PD
Project Implementation Unit	PIU
Pakistani Rupees	PKR
Supervision Consultants	SC

Executive Summary

The Khyber Pakhtunkhwa Rural Infrastructure and Institutional Support Project (KPRIISP), funded by the World Bank, strengthens governance and service delivery in Pakistan's historically underserved Newly Merged Districts (NMDs). It aligns with the Tribal Decade Strategy (2020–2030) to build citizen-centric institutions and uplift vulnerable groups, particularly women. As a key subproject, the proposed new District Complex Ghalanai, Mohmand District, will be built on 2 different plots of various sizes within the existing Government Colony to address critical administrative Offices and residential accommodation gaps. The selected plots for the new buildings are: Plot No. 1 measuring 9.14 kanals in area (for the proposed district complex), , and Plot No. 3 measuring 10.70 kanals in area (for the proposed residential complex). The complex will house offices for the District Administration and line departments; residential units for government staff; and an Officers' Mess for the Government Officials. Ghalanai faces environmental and social challenges, including water scarcity the COD and BOD levels that exceed permissible standards, posing health risks to residents. The ambient air quality is satisfactory in Ghalanai. Additionally, the area has low female literacy rates (21.81%) and limited economic opportunities.

The ESMP ensures compliance with the World Bank's Environmental and Social Framework (ESF) and KP's Environmental Protection Act (2014), adopting proactive measures to mitigate risks. A stakeholder consultation, involving key district stakeholders, at the Tehsil level was held, aimed at evaluating the site's accessibility, safety, and sustainability. Participants recommended features such as ramps, gender-sensitive facilities, and separate waiting and washroom areas, respecting cultural norms. Environmental protection measures include waste management, a proper drainage system, and additional plantation of native species, recommended to promote sustainability. Continuous stakeholder consultations via community briefings and a Grievance Redress Mechanism (GRM) accessible via phone, email, or in-person (resolution within 15 days) are part of the ESMP.

The ESMP provides a structured framework for potential environmental and social risks, defining mitigation targets, assigning responsibilities, and ensuring adequate resource allocation. Key focus areas during the design/pre-construction phase include compliance with seismic and structural design standards, sustainable drainage planning, solid waste management, and detailed health and safety measures. In the construction phase, it addresses critical concerns such as air and water pollution control, noise and vibration mitigation, soil conservation, traffic management, labor safety, communicable disease prevention, and preservation of flora and fauna. It emphasizes proactive planning, continual monitoring, and strict adherence to environmental safety protocols.

A Capacity Building and Training component provides support to the effective implementation of the ESMP by enhancing the skills and environmental awareness of project personnel. This includes targeted training programs for the contractor's workforce and client-side professionals. A well-defined institutional framework that assigns clear roles and responsibilities across project stakeholders. The primary entities responsible include the Project Implementation Unit (PIU), the Supervision Consultant's Environmental Engineer, the Contractor's Site Environmental Engineer, and the Khyber Pakhtunkhwa Environmental Protection Agency (EPA) as the regulatory authority. A project's reporting framework is developed to ensure transparency, accountability, and timely communication with all relevant stakeholders, particularly concerning environmental and social performance.

The total Environmental & Social (E&S) implementation budget is **PKR 8,863,200/-** covering mitigation measures, GRM operation, community engagement, and monitoring. This integrated approach prioritizes sustainability, social inclusion, and transparency throughout the project lifecycle.

2. INTRODUCTION

2.1 Project Description with scope of work

The Tribal Decade Strategy (2020-2030) points to the extension of administrative and service delivery systems as a critical pre-requisite for improving development outcomes for areas facing some of the highest poverty rates in Pakistan. In this context, the Government of Pakistan (GOP) and GoKP have requested World Bank financing to support the first phase of the Tribal Decade Strategy, with a strategic focus on building responsive and accountable institutions for service delivery and development in the Newly Merged Districts (NMD) and Frontier Regions (FRs). The World Bank-funded KP Rural Infrastructure and Institutional Support Project (KPRIISP) will provide complementary and foundational investments in infrastructure and institutional systems that would strengthen the Government's investments, both recurring and development investments, in the merged areas. The KPRIISP aims to enhance service delivery and socio-economic development in the NMD and FRs of KP, addressing long-standing disparities resulting from historical governance gaps and inadequate infrastructure. Aligned with the Tribal Decade Strategy (2020–2030), the project focuses on strengthening integrated service delivery centers at district, sub-divisional, and Tehsil levels, building local government capacity for inclusive and participatory planning, and investing in critical public services, particularly benefiting poor and vulnerable households. Spanning eight NMDs and six FRs, the project emphasizes responsive and accountable institutions, improved infrastructure, and active citizen participation, including empowering women at the grassroots level, to foster sustainable development and reduce multidimensional poverty.

2.2 Project Development Objective

The selected proposed subproject site is located on the main Road adjacent to Ghalanai Bazar. The site coordinates and site pictures, showing the existing site conditions, are placed in Annexure-9. The overall aim of the proposed subproject complex is to fulfil the office and residential accommodation needs of the growing number of Government Officials and employees at the District and Tehsil headquarters. The specific objectives are:

- i. To provide the office accommodation requirements for the District Administration and Line Departments with all required basic and allied facilities, and
- ii) To meet the residential demands of Government Officers and associated staff, with allied services.

While preparing the E&S screening checklist of the subproject it has been observed that the construction activities of the proposed District Complex will have some moderate level concerns/impacts, within the site and immediate surrounding areas, such as air and water pollution, noise and vibration, soil conservation, generation of construction and solid waste, traffic management, labor safety, and preservation of flora and fauna can arise. In view of this fact, the ESMP provides a key focus on air and water pollution control, noise and vibration mitigation, soil conservation measures, sustainable drainage planning, solid waste management, and detailed health and safety measures.

2.3 Project Components

The proposed new District complex will be built on 2 different plots. The specific area of each of the plots is: Plot No. 1 is 9.14 kanals in size (District Complex), and Plot No. 2 is 10.70 kanals (Residential Complex). Maps and Architecture Drawings are placed at Annexure 6 (Drawing no. 2 shows both sites of the complex). The proposed complex has the following components:

1. One block having a Ground + 2-storied Office building for accommodating the District Administration, and line department offices (Drawing no.3, Annexure 6).
2. 1 block of a 3-bed apartment building, G+3 story for Government Officers (Drawing no. 9, Annexure 6).

3. 2 blocks of 2-bed apartment buildings, G+2 story for Government Officials (Drawing no. 9, Annexure 6)..

In addition to the proposed new construction of buildings for Offices and residential accommodation, the subproject includes the demolition of an existing office building on plot no. 3 (proposed residential complex site) and plot no. 1 (proposed district complex site), a major portion of which is structurally damaged in a previous blast, and has been lying vacant. A few rooms of this building are ok, where the Deputy Commissioner's office staff (60 officials) have their offices.

Also, the subproject will carry out 2.5 km of road improvement within the compound. The road improvement will comprise of black topping the existing roads and concreting the shoulders of these roads.

The land for the proposed subproject has been in the possession of GoKP for the last 50 years, and presently has a compound of District and Tehsil Administration offices and residences. Therefore, no land acquisition is required for the construction of the proposed District Complex at the proposed site.

The new proposed Office building blocks provide Offices, meeting rooms, male and female visitors' waiting areas, public washrooms (both males and females), kitchens on each floor, a prayer area, service and circulation areas for easy access and circulation of the officials and the public, and car parking facilities for official visitors.

The residences and apartment buildings will provide the required residential facilities and accommodation for the Officers and other Government Officials.

All the buildings are provided with open lawns within and surrounding for better fresh air circulation and proper parking facilities, Map 3 and 9 of annexure 6 shows facilities to be provided..

2.4 Area of Influence of the Subproject

The proposed District complex subproject site is located on the main Mohmand Agency Road. The site is approximately 400 meters from the Ghalanai Bazaar, and its area of influence within a radius of 250 to 300 meters on the western side is a school. Of plot no. 2, on the western northern side at a distance of 200 meters is a Higher Secondary school, and on its western southern side, at a distance of approximately 200 meters, is the DHQ Hospital. The area of influence of the subproject is provided in Map no 2, Annexure 6.

3. LEGAL, POLICY FRAMEWORK, AND REGULATORY REQUIREMENTS

3.1 Applicable Environmental and Social Policies

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. The WB's ESF Environmental and Social Standards applicable to this subproject are as follows:

- **Environmental and Social Standard 1:** Assessment and Management of Environmental and Social Risks and Impacts;
- **Environmental and Social Standard 2:** Labor and Working Conditions;
- **Environmental and Social Standard 3:** Resource Efficiency and Pollution Prevention and Management;
- **Environmental and Social Standard 4:** Community Health and Safety;
-
- **Environmental and Social Standard 10:** Stakeholder Engagement and Information Disclosure.

These Standards establish objectives and requirements to avoid, minimize, reduce, and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts.

3.2 National and Provincial Legal and Regulatory Framework

Environmental governance in Pakistan has evolved significantly since the introduction of the Environmental Protection Ordinance (EPO) of 1983, providing a legal framework for addressing pollution and environmental degradation. The EPO 1983 was improved after an extensive and prolonged consultative process with all stakeholders, and a new law, the Pakistan Environmental Protection Act (PEPA), was promulgated in December 1997. In 2000, the Pakistan Environmental Protection Agency (Review of IEE and EIA) PEPA Rules were prepared for the operationalization and application of the Act. The 18th Constitutional Amendment devolved environmental governance to the provincial level, allowing provinces to legislate and enforce their environmental laws. Under the 18th Amendment, the Provincial Government enacted the Khyber Pakhtunkhwa Environmental Protection Act of 2014 to protect, conserve, rehabilitate, and improve the environment within the province. Under section 31 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the Government of Khyber Pakhtunkhwa makes the Khyber Pakhtunkhwa Environmental Assessment Rules 2022. KP Environmental Assessment Rules in Section 2 provide the rules for the proposed assessment of projects. The details of the rules are as under:

4. Projects requiring an EIA or IEE, or GEA. ---Where the project falls with the categories mentioned in Schedules II, III, and IV, the proponent shall file EIA or IEE or GEA, respectively, with the Agency.

5. 6. Preparation of guidelines for EIA, IEE and GEA. --- Guidelines for the preparation of EIA or IEE, or GEA of general and sectoral applicability may be specified by the Agency, provided that such guidelines may indicate specific assessment requirements for planning, construction, and operation of a project relating to a particular sector.

This subproject has low to moderate environmental and social risks and therefore falls in the General Environment Assessment category. The E& S Screening Checklist of the subproject is placed in Annexure 2.

3.3 Institutional Responsibilities

While the Pak-EPA is the federal agency, each province also has its own Environmental Protection Agency (EPA), which works independently within its respective jurisdiction. Khyber Pakhtunkhwa (KP) has its EPA. The KPRIISP project operates in the NMAs, and they are now part of the KP, so the regulatory authority for the KPRIISP and its subprojects is the EPA, KP.

The subproject is committed to ensuring environmental compliance. Accordingly, General Environmental Approval (GEA) will be obtained from the EPA-KP, in line with the Environmental Protection Act, 2014, and the Environmental Assessment Rules, 2021, before initiating any construction activities under the proposed subprojects.” The relevant section of the EPA Environmental Assessment Rules, 2021, is placed at Annexure 1.

4. ENVIRONMENTAL AND SOCIAL BASELINE

Ghalanai is the largest town and headquarters of Mohmand District in Khyber Pakhtunkhwa, Pakistan. It is located at 34°19'16N 71°24'0E with an altitude of 651 meters (2139 feet). Ghalanai is the administrative capital of Tehsil Halimzai and Mohmand District, Khyber Pakhtunkhwa Province in Pakistan.

4.1 Environmental Baseline

An environmental baseline for Ghalanai in Mohmand District includes its Biological and physical environmental characteristics, potential sources of pollution, and its challenges.

Biological Environment

The Ghalanai is situated in a mountainous region characterized by barren slopes and rocky terrain. It is in the semi-arid to sub-humid subtropical and temperate climatic areas. It has a diverse plant flora adapted to its semi-arid to sub-humid, sub-tropical, and temperate mountainous region.

Flora and Fauna: In the Ghalanai, among the trees, mesquite, ber, various specimens of acacia, jhands, gurgura Farnaciana, and Kikar are commonly found. Additionally, numerous herbs, such as polli and chaulai can be found in the area. Common shrubs found in the project area include sanatha, ak, the small red poppy spera, camelthorn, and paighambari-gul, as well as drab grass. At the subproject site, there are approximately 60 large trees and 70 shrubs, and flowering plants in and around the proposed plots of the District Complex site. The trees are of various kinds, like **Chir Pine (*Pinus roxburghii*)**, **Black Mulberry (*Morus nigra*)**, **Babul/Acacia (*Acacia nilotica*)**, **Cypress**, and **Eucalyptus**. More than 50% of trees are of Eucalyptus. The most commonly sighted animals of the Ghalanai area include wild pigs, foxes, jackals, rabbits, and monkeys. Some bird species, such as chakore, partridge, see-see partridge, ducks, snipe, quail, wild geese, and sand-grouse, are present in and around Ghalanai.

Physical Environment

The water, air, and soil quality in Ghalanai town, District Mohmand, present mixed conditions, especially concerning water scarcity and contamination.

Topography: Ghalanai is situated in a mountainous region characterized by barren slopes and long rows of rocky hills, crags, and spurs. The area's average height is 750 meters, with the highest elevation point at 890 meters on the northwest side near Kuz Wali Baig and the lowest elevation at 630 meters downstream.

Climate: Ghalanai has a variable climate with cold winters and hot summers. Physiographic features, especially altitudes, have a major impact on local climatic conditions. This is well depicted by the soils and vegetation of the area. During the summer months, there is a great fluctuation in diurnal temperature in the open and in the shade of hilly areas. The mean maximum temperatures during the hottest months of June and July are 38 °C and 28 °C, respectively. December and January are the coldest months with a mean minimum temperature of about 12 °C and 9 °C.

Soil Morphology: Soils of the subproject area are clay loam, non-calcareous, non-saline, and non-sodic in nature. Soil pH is slightly to medium alkaline. The soils are low in organic matter and nitrogen content, low in phosphorus, and low to medium in potassium content. Landform in the area is varied, and includes piedmont, plains, valleys, gravel fans, rough broken land, and gullied land. Level areas are loamy, while lowlands are calcareous in nature. The organic matter and phosphorus content are very low.

Water Quality and Resources: The source of the current Water Supply Scheme for Ghalanai town is 9 tube wells at Charsadda (at a distance of 10 kilometers from Ghalanai Town), from where the water is extracted and taken to Ghalanai. Then this water is uplifted to an overhead water tank and supplied to the citizens of Ghalanai. The total water extracted from each tube well for 5 to 6 hours per day is 30,000 gallons. extraction. The average underground water

table varies from 350 feet to 550 feet in depth. The subproject site, the Government colony, is getting water from these tube wells.

The current sewage and drainage system in Ghalanai is insufficient and poorly maintained. The reliance on open drains, which are not properly sloped or maintained, has resulted in residents improperly disposing of sewage and drainage water in the streets or temporary or open drains. In the subproject area, there is no underground sewerage system; rather, all the existing buildings have septic tanks for the wastewater collection and for preliminary treatment. The effluent from the colony's septic tanks is ultimately discharged into a dry seasonal nalla located outside the colony. Water quality data, of drinking water and surface/wastewater samples, revealed that, except for the COD and BOD, all other parameters tested are in compliance with the National Environmental Quality Standards (NEQS) for liquid effluents and drinking water, respectively. The COD in Khwajas Kor is 290 mg/l, and near Akhun Zadgan Masjid, the COD value is 250 mg/l, while the NEQS value is 150 mg/l for COD. Similarly, the BOD for the above sites is 142.5 mg/l and 122.5 mg/l, respectively, while the NEQS value of BOD is 80 mg/l. The water quality test results are provided in Annexure-8. The water data in annexure-8 are secondary sources, and the water quality test will be done before the construction starts by the contractor from the EPA, KP registered laboratory, for establishing a baseline for later stage monitoring.

Ambient Air and Noise Quality: Overall, Ghalanai town's air and noise quality meet national standards, showcasing positive environmental conditions but also highlighting the need for continuous monitoring to ensure sustainability. The levels of Nitrogen Oxides (NO, NO₂, and NO_x) were well within the National Environmental Quality Standards (NEQS). Sulfur Dioxide (SO₂) was also compliant with NEQS limits. Carbon Monoxide (CO) levels across all monitoring sites were within permissible limits. Particulate Matter (PM₁₀, PM_{2.5}, and SPM) at all sites complied with NEQS standards. Lead, Airborne Particles, and Ozone levels were also well below NEQS limits. The ambient air quality test results are provided in Annexure-8. The ambient air data in annexure-8 are secondary sources, and the air quality test will be done before the construction starts by the contractor from the EPA, KP registered laboratory, for establishing a baseline for later stage monitoring.

Noise Levels: Hourly noise monitoring at ten locations showed that all sites complied with commercial noise standards during both day and night. The noise levels test results are provided in Annexure-8. The noise level data in annexure-8 are secondary sources, and the noise level test will be done before the construction starts by the contractor from the EPA, KP registered laboratory, for establishing a baseline for later stage monitoring.

Geology and Soil Quality: The Ghalanai area consists of a blend of sedimentary, igneous, and metamorphic rocks. The most common sedimentary formations consist of sandstone, limestone, shale, and conglomerate. These formations can be a source of sedimentation and soil erosion. Metamorphic rocks in the area include schist, slate, marble, and thick patches of pure clay. The soils are derived mainly from the local weathering of bedrock deposited by streams and rivers, though windblown soil also exists to some extent.

Heavy Rainfall and Flash Flooding: Ghalanai has not encountered significant flooding or infrastructure damage in the past; however, heavy rain and the monsoon seasons have resulted in a minimal flow of water along the natural nullah.

4.2 Social Baseline

The social landscape of Ghalanai is characterized by significant gender disparities in education, limited locally available means of economic activities, as the main reliance is on agriculture and labor for livelihoods. Addressing the socio-economic challenges, particularly in education, remains crucial for sustainable development.

Population: According to the 2023 census, Ghalanai Town has a population of approximately 33,721, a male population of 17,097 persons, and a female population of 16,624 persons, with only one transgender person, showing a sex ratio of 102.92. The population of Ghalanai is growing at a rate of 2.1% annually. The recorded average household size is 8.7 persons, indicating large family units.

Literacy Rate: The overall literacy rate in Ghalanai is 45.18% showing a reasonably higher literacy rate among the new merged areas. However, a significant gender disparity exists, with male literacy at 66.67% and female literacy at 21.81%. The low female literacy rate highlights barriers such as limited access to schools, cultural norms, and security concerns that hinder educational attainment for women and girls.

Healthcare Challenges: The existing health facilities in Ghalanai are sufficient to meet the needs of the resident population. The District Headquarters (DHQ) hospital in Ghalanai provides comprehensive healthcare services to the community. The surrounding outskirts of Ghalanai are served by the 5 Basic Health Units (BHU), one private General Hospital, and two private Medical Centers. These BHUs and several private healthcare centers provide comprehensive coverage.

Economic and livelihood: The primary economic activities in Ghalanai are mainly based on agriculture, particularly vegetable cultivation, and the extraction of minerals like marble and chromite. Other sources of livelihood of people include trading, particularly with Afghanistan, and employment in cities across Pakistan.

Religious and Linguistic Diversity: The majority population in the Ghalanai is Muslim; however, religious minorities are residing in the town. Pashto is the dominant language of the Ghalanai; however, Punjabi, Urdu, Balochi, and Kohistani are also spoken.

5. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

5.1 Stakeholder Identification and Public Consultation

The potential stakeholders for the subprojects were identified, in consultation, held on 17 June 2025, with the respective District Administration at the inception stage, Ghalanai, when the requirements of the Administration were obtained for the subproject. The approach adopted for the consultation process in newly merged areas is to have the first consultation with the relevant District /Tehsil administration to get their views and understanding with the process and later with their advice hold broad level consultation for each subproject. This approach has adopted in view of the prevailing venerable security environment and has been worked well for the project. A consultation session was conducted on May 22, 2025, in the District Administration Office, Ghalanai, with the relevant government departments. The list of participants is in Annex 10 and the photographs of the consultation and site area are shown in Annexure -7..Table 2 in Section 5.2, show the stakeholder's identification, their respective Interest and roles in the subproject. A sample-based approach has been adopted. The objectives of the consultation were to inform the stakeholders about the subproject design, its environmental and social impacts during the project implementation. Suggestions and concerns were recorded and addressed in this ESMP for compliance during the execution phase. Stakeholder consultations will be a continuous process under the subproject, and more sessions will be carried out as per the guidelines given in SEP. Consistent with the KPRIISP SEP, this subproject adopts the principles of openness, cultural appropriateness, and inclusiveness. Special attention is paid to vulnerable groups to ensure they are not disproportionately affected. In the consultation, the stakeholders provided their feedback regarding the subproject and also gave their suggestions to further improve the subproject functionality. Stakeholder feedback is presented below. Stakeholders viewed the proposed site for the District Complex as an easily accessible site for the public, including women, the elderly, and administrative use.

- The site is inside Government Colony; therefore, it is a safe place for the women to visit the Government Offices for their required official work in the offices.
- The provision of features such as secure lighting, privacy-conscious layouts, and well-maintained pathways was appreciated as a thoughtful approach to gender-sensitive infrastructure that promotes safety, dignity, in line with local tradition, values, and empowerment for women and girls.

The suggestions that the stakeholders made in the consultation and their respective responses are presented in the following table:

Table 1: Stakeholder Recommendations and the Respective Response

Serial No.	Stakeholder Recommendation	Response to the Recommendation
1.	An additional tree plantation program focused on native species, which will further restore and improve the ecological balance and green cover around the complexes.	Landscaping and plantation will be done at the time of the finishing stage of construction of the complex. The cost of the additional plantation and landscaping is included under the "External Development Head".
2.	Stakeholders highlighted the urgent need to explore alternative, sustainable water solutions that would reduce dependence on distant groundwater sources.	Feasibilities for an alternate source of water supply will be explored at the time of construction of the complex. The required cost of these facilities are included in the subproject PCI.

3.	Existing septic tanks and drainage systems were identified as inadequate to handle the projected increase in water demand. Stakeholders urged a thorough redesign and alignment of sanitation infrastructure to prevent environmental contamination, waterlogging, and associated public health risks	A proper wastewater and drainage system of the complex is part of the design of the complex.
4.	Features such as ramps, handrails, gender-segregated facilities, well-lit spaces, and shaded waiting areas will enhance comfort and safety for all users.	The proposed design of the complex included gender-segregated facilities (separate washrooms and waiting areas for males and females), shaded waiting areas for visitors. Facilities like ramps, handrails, and lighting arrangements will be provided at the finishing stage of the building. s

5.2 Stakeholder Analysis

The purpose of stakeholder analysis is to systematically identify individuals, groups, and organizations who may be affected by or have an interest in the proposed subproject activities, and to assess their interest and roles. This ensures that engagement efforts are inclusive, contextually appropriate, and effective in addressing both risks and opportunities. Stakeholders have been categorized based on their relationship to the subproject. They are the primary stakeholder, those individuals and groups directly affected, positively or negatively, by the subproject. Secondary stakeholders are, who have an interest in the project but are not directly affected. The following Table represents the identified stakeholders and their potential interest in the project.

Table 2: Stakeholders Identification and their respective Interest and roles

Serial No.	Stakeholders	Project Impact, their Interest, and role
Primary Stakeholders		
1.	Deputy Commissioner, District Mohmand, KP	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
2.	Additional Deputy Commissioner, District Mohmand	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
3.	XEN Highway C&W Department, District Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
4.	Divisional Forest Officer, Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.

5.	District Officer, Social Welfare Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
6.	District Food Controller, Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
7.	District Education Officer, Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
8.	Subdivisional Forest Officer, Forest	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
9.	Assistant Director, Industries	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
10.	Sub Divisional Officer, TESCO Ghalanai	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
11.	Naib Tehsildar, Ghalanai, District Mohmand	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
12.	Reader, Assistant Commissioner's Office	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
13.	Families of the Government Officials living in the area in existing houses	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
14.	Vulnerable and Marginalized Groups (Families living in servant	Women, the elderly, and persons with disabilities may not get specific attention to ensure inclusive participation and to avoid exclusion or disproportionate negative impacts.

	quarters of existing houses)	
15.	Coloney's School Teachers	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
16.	Colony's School Students	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
17.	Health Facility Staff	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
18.	Visiting and outdoor patients of Hospital	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
19.	Vendors with Passport Office	Concerned about disturbance in routine activities due to construction.
Secondary Stakeholders		
20.	Local Religious Leaders (Imams, Pesh Imams)	Hold moral authority and can influence public perception of the project.
21.	Local Administrative Authorities (Tehsil and District Level)	Involved in need assessments, land coordination, law and order, and service delivery.
22.	Environmental Protection Agency, Khyber Pakhtunkhwa (EPA-KP)	Regulatory authority responsible for ensuring environmental compliance and reviewing ESMP documentation.
23.	Contractor (s) and Construction Workers	Involved in implementation; requires clear orientation on social and environmental safeguards.
24.	Media and Information Channels (Local Radio Channels)	Important for public disclosure, awareness-raising, and helping to spread accurate information.

5.3 Stakeholder Engagement Plan & Disclosure

This Stakeholder Engagement and Disclosure Plan outline how stakeholders will be involved and informed during the **construction phase** of the project under the ESMP in Ghalanai, Mohmand. Its purpose is to ensure continuous two-way communication, enhance social accountability, reduce conflicts, and foster community support through timely and culturally appropriate engagement. Consultations with women will be held in "private spaces" or "gender-neutral spaces" by female staff (as noted in SEP Section 2.3). Communication materials will use images/infographics for those with low literacy (as per SEP Section 6.3).

Table 3: Engagement Activities and Methods (During Construction)

Activity	Target Stakeholders	Frequency	Communication Method	Responsibility
Community Briefings	Residents (male & female), tribal elders, local community-based organizations	Monthly	Public meetings, mosque announcements, and community centers	Contractor's social staff, Supervision Consultant Social Staff

Information Disclosure	General public	Quarterly	Posters, notice boards, Urdu & Pashto pamphlets, Disclosure on C&W/P&D Websites, Announcements via local Mosques (for construction timing/safety), Social Media updates	Communication Officer, PIU C&W
Focused Group Discussions (FGDs)	Local Residents	Bi-monthly	Small group meetings, female outreach through the Gender staff	Social and Gender Staff
Grievance Redress Mechanism (GRM) Activation	All stakeholders	Weekly	Complaint boxes, hotline, in-person reporting, and all intake measures as these become available	Grievance Officer
On-site Signage & Safety Notices	Public, labor, and daily commuters to the complex.	Weekly	Visual safety signs, barriers, and flagmen	Contractor HSE team
Coordination Meetings	District administration, EPA-KP	Quarterly	Formal briefings, email reports, and written updates	PIU

6. ENVIRONMENTAL AND SOCIAL MONITORING PLAN

6.1 Potential Environmental and Social Impacts, Mitigation Measures, and Monitoring Plan

The Environmental and Social Management Plan (ESMP) provides the framework for the implementation of the mitigating measures and environmental management and monitoring during the construction and operation phases of the proposed subproject. The proper implementation of the ESMP will ensure that any adverse environmental impacts are adequately mitigated, either totally, prevented, or minimized to an acceptable level, and required actions to achieve those objectives are successfully taken by the concerned institutions or regulatory agencies. The implementation of ESMP will be carefully coordinated with the design, construction, and operation programs of the project to ensure that relevant mitigation measures are implemented at the appropriate stage and adequate resources are properly allocated to achieve the desired results.

Table 4, below, provides the Environmental Management Plan. The proposed schedule for the ESMP is 3 years, comprising the first 3 months for the pre-construction phase for contractor mobilization and carrying out the required initial stage preparation. The 2 years and 3 months will be for the construction phase to complete the construction of buildings. The last 3 months are for post post-construction phase for handing over the built complexes to the respective administration. However, the ESMP schedule is contingent upon the subproject's approval from the relevant Government forums and initiation. The actual timeline will be defined once those formalities are completed." The plan outlines impacts, targets, mitigations, and the responsible authorities for the implementation of the mitigation measures during design, construction, and operational phases.

Table 4: Environmental Management Plan

Sr. No.	Parameters	Target	Mitigation	Status of Activity	Implementation Responsibility
Design/pre-construction Phase					
1	Design & Layout Planning	Intended to fulfil all the desired needs of the District, Tehsil Administration, enhance the complex's aesthetic, and focus on the functional aspects of the proposed complex.	All structural, layout, and engineering designs of the district complex must comply fully with applicable laws, engineering standards, and prescribed technical parameters.	Done	PIU, C&W
2	Drainage	To prevent standing of water, flooding and pooling of water in and around the buildings and circulation areas.	- Provision of appropriate drainage facilities and structures should be provided in the building complex; and - Proper slopes shall be incorporated in the design feature to avoid the formation of a water layer on road surfaces in rainy seasons.	Done	PIU, C&W
4	Seismic Hazard	To minimize the structural damage	The proposed building and structures will be designed and constructed to withstand low to moderate earthquakes.	Done	PIU, C&W

5	Traffic Management	To minimize traffic problems in the project area	; - Once the contractor is mobilized, in the first three months of the project time, he/she will prepare a comprehensive Traffic Management Plan and disclose it before construction begins, ensuring measures are in place to prevent traffic congestion and safeguard community convenience. Vehicle movements for transporting construction materials shall be strategically timed to minimize traffic impacts and avoid inconvenience to residents.” - Plan the timing for the movement of vehicles carrying construction materials to reduce traffic load and avoid inconvenience to the residents;	To be Prepared,	Contractor to provide plan, PIU, C&W to ensure and monitor
6	Health and Safety	To minimize health risks	- The contractor will prepare a detailed health and safety plan with all necessary and required mitigation measures that will minimize health risks of the surrounding community and the labor involved in construction. The proposed plan will be submitted to the PIU and will be made public before the construction activity begins; and - An emergency response plan will be formulated by the contractor that emphasizes a line of action for rescue, medical emergencies, natural disasters, and firefighting operations at the construction site and submit it to PIU before the construction activity begins.	To be prepared.	Contractor to provide the plan, PIU, C&W to ensure and monitor

7	Solid Waste Management	To manage (i.e., collect and dispose) the solid waste safely at appropriate sites.	- The contractor will prepare a comprehensive solid waste management plan incorporating technical design features for refuse collection from the camp site and construction site and its safe disposal at the designated places to ensure it is not burnt on site - The contractor will devise plan(s) for safe handling, storage, and disposal of harmful waste and materials.	To be prepared.	Contractor to provide the plan PIU, C&W to ensure and monitor
Construction Phase					
1	Noise and Vibration	To minimize noise pollution and fulfill the Regulatory Compliance under the NEQs.	- Selection of up-to-date and well-maintained plant or equipment with reduced noise levels ensured by suitable in-built damping techniques or appropriate muffling devices; - Confining excessively noisy work to normal working hours in the day, as far as possible; - Restricting construction vehicles' movement during nighttime; - Avoid the use of heavy drill machines to avoid the vibration effect on the surrounding buildings; - Vehicles and equipment used should be fitted, as applicable, with silencers and properly maintained; - Use of low noise machinery, or machinery with noise shielding and absorption; - Contractors should comply with the submitted work schedule, keeping noisy operations away from sensitive points; implement regular maintenance and repairs; and employ strict implementation of operation procedures; and - Providing the construction workers with suitable hearing protection, like ear caps or	To be carried out.	Contractor Environmental Engineer(CEE) and Supervision Consultant (SC) to monitor

			earmuffs, and training them in their use.		
2	Soil Erosion	To minimize soil erosion and contamination.	▪ All kinds of oil spills from construction machinery on the ground shall be scrubbed until the clear surface of soil and the removed clay shall be safely disposed of as desired, and the site will be restored to its original conditions; ▪ Unnecessary excavations should be avoided; ▪ Septic tanks connected to soakage pits of adequate capacities will be constructed for receiving and treating wastewater from all temporary worksite toilets and at the temporary container offices, if any. ; ▪ The toilet wastewater should not be discharged untreated onto the adjacent lands/sewers/disposal station; and ▪ Washout from washing of equipment and gadgets will be drained into either a septic tank or a sand-gravel bed for removal of the grit and contaminants.	To be carried out.	CEE and Supervision Consultant (SC) to monitor
3	Air Pollution	To minimize air pollution and fulfill the Regulatory Compliance under the NEQs	▪ All sites where excavation work will be carried out will be sprinkled with water to control dust; ▪ The excavated material shall be covered and shall not be stored for long intervals; ▪ Preventive measures like batching and mixing operations shall be performed in enclosed or controlled areas, installing screens around the mixing and unloading operation areas at the site, and no "Overloading" shall be enforced to prevent spillage of fine materials during transport operations. ; ▪	To be carried out.	CEE, and Supervision Consultant (SC) to monitor

			▪ All vehicles, machinery, equipment, and generators deployed during construction shall be maintained in sound working condition, regularly serviced (as prescribed by the manufacturer), and properly tuned to minimize exhaust emissions and ensure compliance with applicable environmental standards.; ▪ All vehicles, machinery, and equipment used for the construction shall be plugged off or switched off immediately after completion of their work to avoid idling conditions; ▪ Emissions from power generators and construction machinery are important point sources at the construction sites. The filter shall be installed at the point sources of air emissions and shall be replaced regularly as prescribed by the manufacturer. Proper maintenance and repairs of the equipment are needed to minimize hazardous emissions; ▪ Open burning of solid waste from the Contractor's camps should be strictly banned; ▪ Construction workers should be provided with masks for protection against the inhalation of dust; and ▪ PEQS applicable to gaseous emissions generated by construction vehicles, equipment, and machinery should be enforced during construction works.		
4	Water Quality and Availability.	To protect the ground and surface water resources from any pollution due to the construction of the subproject and fulfill the	▪ Protection of surface and groundwater reserves from any contamination sources, such as construction and oily wastes that could degrade their potable quality;	To be carried out.	CEE, and Supervision Consultant (SC) to monitor

		Regulatory Compliance under the NEQs.	- Wastewater effluent from the contractor's workshop and equipment washing yards should be passed through gravel/ sand beds to remove oil/ grease contaminants before discharging to the final disposal point; - Water required for construction is obtained in such a way that the water availability and supply to nearby communities remain unaffected; - For construction purposes, water shall be drawn from surface water bodies on priority and as available; - Regular water quality monitoring according to a determined sampling schedule provided in Table 6, belowThe contractor shall ensure that construction debris does not find their way into the drainage network, which may get clogged; - Contractor and his/her staff will not allow the wastewater from machinery and vehicle washing not mix with surface waters; instead, sealed washing basins shall be used and all the wastewater shall be directed to a sedimentation or retention pond ; - Any Waste (solid/liquid/hazardous) shall not be discharged into any surface water body. All such disposals must follow designated safe and approved methods. ; and . - During all road improvement activities, the contractor shall implement effective controls to prevent construction debris and other waste from entering		
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			the drainage system. Appropriate measures—such as installing silt traps and regular site housekeeping—must be applied to ensure that no materials obstruct the drainage network.		
5	Solid, Construction Waste, and Hazardous Waste	To minimize the solid, construction, and hazardous waste	▪ Schedule training and awareness sessions for the workforce before the start of the construction work on the proper storage and handling of materials and chemicals that may pose a risk of soil contamination. ▪ A comprehensive waste management plan shall be prepared by the contractor and implemented. All the solid waste generated during construction and from camp sites shall be safely managed and disposed of at designated waste disposal sites. ; ▪ Burning of waste will be prohibited; ▪ The hazardous waste shall be stored in closed containers, with proper labelling of containers, including the identification and quantity of the contents, hazard contact information, etc; ▪ The solid waste will be disposed of in designated landfill sites to protect the underground water from contamination. ▪ Training employees involved in the transportation of hazardous material regarding emergency procedures; ▪ Ensure the availability of emergency response services on a 24-hour basis, including trained medical staff, first-aid and medical kits, firefighting equipment (such as extinguishers and breathing apparatus), and ambulance services	To be done.	CEE, and Supervision Consultant (SC) to monitor

			▪ The sewage system for the campsite will be properly designed (pit latrines or, as required, septic tanks) to receive all sanitary wastewaters; ▪ Lined wash areas will be constructed at the site for the receipt of wash waters from construction machinery; ▪ All the stored hazardous materials shall be securely covered to prevent any possible leakage during heavy rainfall. I.. ▪ Locating stockpiles of material at such places to minimize potential visual impact; and ▪ Minimizing the land intake of stockpile areas as far as possible.		
6.	Removal of Asbestos causing health risks due to fibers of Asbestos contaminating air, soil, and water. Lung's cancer and mesothelioma are known risks.	To protect humans from health risks and to prevent fiber release and contamination.	Once it is established that Asbestos material is present in the underground wastewater pipes of the old building to be demolished, the following measures will be ensured: ▪ A licensed and Qualified firm will be engaged to identify and plan for safe management, storage, and disposal of asbestos-containing materials; ▪ Use of specific PPEs will be ensured at the time of removal, storage, and disposal; ▪ Apply a wetting agent (Water, etc) to reduce fiber release during the removal and storage process; Asbestos waste must be securely packaged: sealed, labeled, and placed in leak-tight containers or heavy-duty plastic bags; Asbestos-containing materials will be stored in closed containers away from direct sunlight, wind, and rain; ▪ Limiting access to waste storage areas to only those		PIU, CEE, SC

			employees who have received proper training; - Identifying (label) and demarcating the area, including documentation of its location on a facility map or site plan; - All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, and be properly loaded on the transport vehicles before leaving the site; - During transport, vehicles should be enclosed to prevent fiber release, and containers should remain intact. - Safe disposal of the containers in the EPA, KP-registered hazardous waste facility in accordance to the EPA rules and standards within the province; and - Area, equipment, and PPEs will be decontaminated.		
7	Health and safety of workers and associated communities	To minimize the health and safety risks to construction workers and the surrounding communities arising from general construction activities, with particular emphasis on hazards related to demolition works, working at heights, fire and explosion, slips, trips and falls, electro-mechanical hazards, exposure to hazardous materials and biological agents, and risks associated with unstable foundations.	- Obligatory insurance against accidents for laborers/workers shall be ensured; - Basic medical training shall be provided to specified workers basic medical service and supplies such as first aid medical supplies and medicine, ambulance service shall be made available at the site; - Layout plan for campsite, indicating safety measures taken by the contractor, e.g., firefighting equipment, safe storage of hazardous material, first aid, security, fencing, and contingency measures in case of accidents; - Work safety measures and good workmanship practices are to be followed by the contractor to ensure no health risks for laborers;	To be done	CEE, and Supervisory Consultant (SC) to monitor

			- Protection devices (ear muffs) should be provided to the workers doing a job in the vicinity of high noise-generating machines; - Provision of protective clothing for laborers handling hazardous materials, e.g., a helmet, adequate footwear for bituminous pavement works, protective goggles, and gloves, etc. - Ensure strict use of protective clothing and other necessary equipment during work activities; - Emergency number shall be placed at worksites; - Develop a contingency plan to address major accidents, including fires, explosions, chemical spills, structural failures, and natural disasters ; - The construction supervisor must ensure that only authorized workers shall be allowed inside the construction site boundary, and that all non-workers — including visitors, passersby, and especially children — are strictly prohibited from entering. The contractor shall develop a procedure/protocol that shall be followed for all the official visitors at the specific site. The said procedure/protocol shall be approved by PIU, C&W. The contractor shall provide and maintain adequate traffic management and safety controls at internal road improvement sites. This includes installing clear and visible signage, lighting devices, physical barriers, and warning tape, as well as deploying trained flag personnel to ensure safe	
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			movement of vehicles, equipment, and pedestrians ; ▪ There shall be proper control on construction activities, and the oil spillage, and leakage from vehicles could be controlled on site by conducting routine inspections of the engine, transmission, and hydraulic systems, checking and replacing worn-out seals, gaskets, hoses, and filters, and monitoring oil levels frequently to detect abnormal loss; ▪ Efforts will be made to create awareness about road safety among the drivers operating construction vehicles; ▪ The contractor shall ensure timely and accessible public notification regarding all planned road improvement activities. Notifications shall include the nature of works, expected start and end dates, potential traffic or access disruptions, and available detour routes. Information must be disseminated through appropriate channels—such as local notice boards, community meetings to allow the public to prepare and minimize inconvenience ; ▪ The contractor shall install and maintain appropriate safety and diversion signage at all construction and road improvement areas, with special emphasis on sensitive locations and accident-prone sections of the road. Signage must be clearly visible, compliant with applicable traffic safety standards, and placed at a sufficient distance to adequately warn and guide road users, ensuring safe navigation around the		
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			construction zone and road improvement spots ; ▪ Setting up speed limits in close consultation with the local stakeholders; ▪ Workers who shall be reported as ill or exhibit possible symptoms shall be restricted from entering the work site. They shall be promptly isolated and referred to local medical facilities for immediate care; ▪ ▪ The communicable disease of most concern during the construction phase, like sexually-transmitted diseases (STDs) such as HIV/AIDS, should be prevented by successful initiatives typically involving health awareness, education initiatives, training of workers in disease treatment, immunization programs, regular medical checkups of labor and staff, and providing health services; ▪ Reducing the impacts of vector-borne diseases on long-term health effects of workers should be accomplished through the implementation of diverse interventions aimed at eliminating the factors that lead to disease, which include prevention of larval and adult propagation of vectors through sanitary improvements and elimination of breeding habitat close to human settlements, and by eliminating any unusable impounding of water; ▪ A supply of safe drinking water will be made available and maintained at the project site(s); ▪ Chlorinated disinfecting spraying must be conducted at the work site(s); and		
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			▪ Proper hygiene practices in the toilets and washrooms will be implemented with proper and adequate use of soaps and disinfectant spray. In addition to the above general protective measures for the laborer and adjoining community, the contractor and his/her supervisory staff will provide and ensure the specific protective measures, such as: • Provide training and awareness to the concerned staff on handling, storage, and safety of gas cylinders; • Approved demolition plan, utility isolation, barricading, and dust suppression; • Guardrails, certified scaffolding, safety nets, harnesses, and a permit-to-work system; • Fire prevention plan, controlled storage of flammables, hot-work permits, provision and location of firefighting equipment; • Good housekeeping, clear walkways, adequate lighting, and spill control; • Safe temporary electrical systems, earthing, machine guarding, and trained operators; • Proper storage, labeling, MSDS availability, PPE use, and safe disposal; • Proper drainage, sanitation facilities, PPE, and hygiene practices; and • Geotechnical investigation, proper shoring/piling, controlled excavation, and settlement monitoring.	
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8	Labor Camp	To minimize loss of assets and vegetation due to labor movement, to prevent degradation of the environment due to construction camps, and to ensure the camp presence does not cause any concerns for the nearby community.	- All the workers staying in the camp will be issued ID cards for security purposes; - Provision of all required medical health facilities (first aid boxes, reasonable stock of commonly used medicines) in the camp for emergency health services; - The camps will be properly fenced and gated to prevent the entry of outsiders into the camp; - Entry for the local community/any unauthorized persons at the campsite will be prohibited; - Preparation of Waste Management Plan addressing the classification, storage, and disposal of all solid wastes and the training of employees for handling the hazardous materials; - Training will be provided to all staff members and laborers on camp management rules and overall discipline, and cultural awareness; and - The contractor will submit a labor camp management plan.	To be Established	Contractor and PIU
9	Flora and fauna	To protect, conserve, and minimize the impact on flora and fauna	- All efforts will be made to protect and conserve the existing trees and shrubs; - Around 10 trees that will be at the building spot and their cutting is unavoidable; each tree will be replaced with 10 trees of the same species in the available land by the PIU, C&W except the Eucalyptus tree species, which will be replaced with any other local species; - For internal road improvement works, the contractor shall confine all activities within the existing road corridor to avoid unnecessary land disturbance. Existing trees and vegetation shall be protected through	To be looked	CEE, and Supervision Consultant (SC) and PIU to monitor

			appropriate measures such as physical barriers ▪ The Contractor's staff and labor will be strictly directed not to damage any vegetation, such as trees or bushes; ▪ Contractor will provide gas cylinders at the camps for cooking purposes, and cutting of trees/bushes for fuel will not be allowed; ▪ Hunting and poaching of animals will be strictly prohibited, and the Contractor will warn their labor accordingly; ▪ The camps will be properly fenced and gated to prevent the entry of animals in search of edible goods; ▪ Waste from the camps will be properly disposed of to prevent the chances of being eaten by animals, which may become hazardous to them; ▪ Special measures will be adopted to minimize impacts on the birds, such as avoiding noise-generating activities during critical periods of breeding; and ▪ Staff working on the project should be given clear orders not to shoot, snare, or trap any bird.		
10	Traffic Management	To minimize traffic problems in the project area	▪ A proper traffic management plan will be prepared and implemented to avoid traffic jams/public inconvenience within the colony; ▪ Movement of vehicles carrying construction materials should be restricted during the daytime to reduce traffic load and inconvenience to the residents; and ▪ The executing agency must maintain liaison between the residents/visitors, travelers, and the contractor to facilitate	To be prepared	Contractor Traffic Engineer , SC, and PIU

			traffic movement during the construction stage.		
11	Communicable diseases	To minimize the spread of Communicable diseases	A communicable disease prevention program will be prepared by the contractor for construction workers or residents near the construction sites and made public before the construction work started. - Reporting employees and laborers showing symptoms such as fever or high body temperature, coughing, difficulty breathing, or chest pain, and sending them to a clinic or the nearest hospital immediately; - Awareness and implementation of the Quarantine Procedure for all employees who have come back from vacation; - Ensure Disinfection of offices, work areas, and machinery periodically; and - Provision of face masks, instruction boards, and signage at different locations for health hazards awareness.		Contractor
Operational Phase					
1	Natural Hazard	To minimize the risk of structural collapse and flooding in the Tehsil complex	- A technical committee, formed by the District Administration, will carry out detailed scrutiny inspection of all the Engineering drawings of the buildings to ensure that the foundation and the structure are strong enough to withstand in normal conditions of earthquake impacts; - Inspections should be conducted at three three-month or six-month intervals by technical committee of qualified personnel to ensure the integrity of structures; and - Develop an emergency response plan for the rainwater flooding in the sup project site.		PIU

2	Waste	To minimize and store the solid waste	An appropriate waste management system shall be in place during the operational phase. It will integrate technical measures (segregation, treatment, disposal), administrative controls (planning, monitoring, compliance), and community engagement (awareness, collaboration) to ensure sustainability and regulatory alignment .		PIU
3	Drainage	To prevent flooding and pooling	Routine inspection and maintenance of the drainage system, to make sure that the drains are not blocked due to solid waste shall be scheduled and implemented.		PIU
4	Flora	To maintain flora in the district complex	- Routine monthly inspection will be carried out to check the maintenance of the district complex; - Weeds will be monitored weekly and removed no less than every two weeks; - Any tree that poses a concern to public safety will be immediately barricaded and evaluated by an ecologist. Issues of immediate concern would be trees or branches that are leaning or broken, that may fall onto an area of pedestrian or vehicular activity; - The use of fertilizers in open spaces shall be strictly monitored to prevent incidents such as direct human contact or ingestion by birds ; and - Natural nutrients should be preferred.		PIU

Environmental Monitoring is undertaken during both the construction and operational phases to ensure the effectiveness of the proposed mitigation measures. Certain environmental parameters are selected, and quantitative & qualitative analyses will be carried out by an EPA, KP's registered laboratory The results of the analysis will be compared with the guidelines, standards, and pre-project conditions to investigate whether the EMP and its implementation are effective for the mitigation of impacts or not. Parameters to be analyzed during pre-construction,

construction & operation of the project, responsibilities for monitoring have been discussed and provided in Tables 5 to 7 below.

Table 5: 'Pre-Construction' Monitoring Plan for Baseline Development

Parameter to be measured	Objective of Monitoring	Parameters to be Monitored	Measurements	Location*	Frequency	Responsibility
Ambient Air Quality	To establish a baseline for air quality levels	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} & PM ₁₀ (particulate matter smaller than 10 microns) concentration at the receptor level	1-hr and 24-hr concentration levels	At three random receptor locations in the project area	Once	CC
Ambient Noise	To establish a baseline for noise levels	Ambient noise level near the receptors in the project area	A-weighted noise levels – 24 hours, readings taken at 15 s intervals over 15 min. every hour, and then averaged	At three random receptor locations in the project area	Once	CC
Groundwater Quality	To establish the groundwater quality in the project area	Groundwater quality in the project area	Water samples for comparison against NEQS parameters	At two locations around the site in the project area	Once	CC
Surface water quality	To establish surface quality in the project area	Surface water quality in the project area	Water samples for comparison against NEQS parameters	At two locations around the site in the project area	Once	CC

* Monitoring Locations to be finalized jointly between PIU Safeguards staff and the Supervision Consultant (SC).

Table 6: Construction Phase Monitoring Requirements

Project Activity and Potential Impact	Objective of Monitoring	Parameters to be Monitored	Measurements	Location	Frequency	Responsibility
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Noise Disturbance due to noise from construction activity	To determine the effectiveness of noise abatement measures on sound pressure levels	Ambient noise level at different locations in the project area	A-weighted noise levels – 24 hours, readings taken at 15 s intervals over 15 min. every hour at 15 m from the receptors, and then averaged	At five random receptor locations in the project area	Quarterly basis on a typical working day	Contractor's Environmental Officer, SC
Air Quality Dust emissions from construction vehicles and equipment	To determine the effectiveness of the dust control program on dust at the receptor level	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} & PM ₁₀ (particulate matter smaller than 10 microns) concentration at the receptor level	1-hr and 24-hr concentration levels	At five random receptor locations in the project area	Quarterly basis on a typical working day	Contractor's Environmental Officer, SC
		Visible dust	Visual observation of the size of dust clouds, their dispersion, and the direction of dispersion Water sprinkling to settle down the dust.	Constructi on site At the location of the digging Area	Once daily during the peak construction period As and when the dust appears at the construction site	Contractor's Environmental Officer, SC
Groundwater Quality	To establish the groundwater quality in the project area	Groundwater quality in the project area	Water samples for comparison against NEQS parameters	At five locations around the site in the project area	Quarterly	Contractor's Environmental Engineer (CEE), SC
Safety precautions by workers	To prevent accidents for workers and the general public	The number of near-miss events and accidents taking place	Visual inspections	Constructi on site	Once Daily	Contractor's Environmental Engineer (CEE), SC

Soil Contamination	To prevent contamination of soil from oil and toxic chemical spills and leakages	Incidents of oil and toxic chemical spills	Visual inspections and conducting soil analysis	At construction sites and vehicle and machinery refuelling & maintenance areas	Once a month	Contractor's Environmental Engineer (CEE), SC
Solid Waste & Effluent Disposal Insufficient procedures for waste collection, storage, transportation, and disposal	To check the availability of the waste management system and its implementation	Inspection of solid and liquid effluent generation, collection, segregation, storage, recycling, and disposal will be undertaken at all work sites in the project area	Visual inspections	At work sites in the project area	Once daily.	Contractor's Environmental Engineer (CEE), SC

* Monitoring Locations to be finalized jointly between PIU Safeguards staff and the Supervision Consultant (SC).

Table 7: Operation Phase's Environmental Monitoring Plan

Parameter to be measured	Objective of Monitoring	Parameters to be Monitored	Measurements	Location	Frequency	Responsibility
Solid Waste Management	To assess whether solid waste generated from the District complex is managed as per EMP requirements	All waste being generated is being managed and disposed of as per international good practices	Solid waste inventory audit	District Complex premises	Bi-Annual	PIU, District Administration

6.2 Relocation of Employees

In the proposed subproject, the plot identified for the District Office building, in the attached site map the plot no.3 has an existing office building with a major portion structurally damaged in a previous blast, and lying empty. However, a few rooms of this building are all right and safe, and presently occupied by the staff of the Deputy Commissioner

Mohmand's offices. A total of 60 officials has their respective offices in this building. The proposed new construction of the District and Tehsil Administrations Offices will require the demolition of this building, and the officials those are having their offices will be temporarily displaced from their present respective offices. The issue of temporary displacement was discussed with the District Administration, and they informed that they are permanent Government Employees and therefore it is the responsibility of the District Administration to arrange and provide alternate office accommodation within the existing premises during the construction of new Office buildings. In view of the above discussion, there will be no livelihood disturbance of the displaced employees will be involved. It will be ensured that no staff is present in the building before its demolition. Also, before demolition of the building, general protective measures like ensuring workers use appropriate personal protective equipment (PPE), controlling dust and noise, securing the site with fencing and exclusion zones, and planning the demolition to proceed systematically from the top down. A Relocation Protocol for Government Employees is drafted and submitted for the approval of PCMU and the Bank. Once it is approved, it will be implemented at the subproject, and all necessary and required steps to safeguard the interests of the employees, and their families, to be relocated will be strictly followed.

6.3 Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is an institutional arrangement which provides the project's stakeholders an opportunity and a structured mechanism to submit their concerns. The grievance redress mechanism will focus on the following steps/points during the implementation process:

- Record grievances, both written and oral, categorizing and prioritizing them, and providing solutions within an agreed-upon timeframe;
- Reporting to the aggrieved parties about the resolutions regarding their grievances and the decision;
- Dissemination of various reporting channels such as complaint boxes, complaint register, PIU phone numbers, online complaint registration and proformas for complaints.
- All information about grievance procedures, grievance forms, and responses will be available in languages readily understandable to the locals.
- During GRM orientation, inform labor and associated staff about alternative reporting channels, including the GRM register, telephone numbers, and online portals, in addition to the GRM boxes.
- All complaints received will be treated with confidentiality.

The Grievance Redress Mechanism (GRM) is an effective tool for early identification, assessment, and resolution of concerns, complaints and suggestions. A key emphasis will be to quickly respond to all highlighted and reported concerns or grievances, as per the KPRIISP GRM Manual.

Grievance Registration and Resolution Process

Submission: Complainants can lodge grievances through:

- **Focal Person:** Deputy Director (Environment & Social), PIU C&W KP-RIISP
- **Phone:** +92 91 9224272
- **Email:** usmanshinwari179@gmail.com
- **Website:** <https://www.cwd.gkp.pk/projects/KP-RIISP>
- **In person/letter:** House No. 8-BC, Park Road, University Town, Peshawar, Khyber Pakhtunkhwa
- **Complaint Box/Registers** at site offices

Recording and Categorization: All grievances (oral or written) will be registered, categorized (urgent/regular), and logged in a centralized GRM database.

Investigation and Resolution:

The Deputy Director (E&S) will coordinate with C&W PIU staff or field officers to investigate the issue. The resolution will be shared with the complainant within the agreed timeframe.

Follow-up and Feedback:

The complainant will be informed in writing (or preferred method) of the decision/resolution and any follow-up actions.

Appeal and Escalation Mechanism:

If not satisfied, complainants may escalate the issue to:

- **Project Coordination & Management Unit (PCMU), P&D Department**
 - **Focal Person:** Senior Social Development Specialist
 - **Phone:** 091-9213022
 - **Email:** ssds@kp-riisp.gov.pk
 - **Address:** Civil Secretariat, Peshawar, KP

Grievance Redress Committee (GRC)

To support timely grievance handling, a Grievance Redress Committee (GRC) will be formed at the PIU level. The GRC will meet on a regular basis (or as needed) to address escalated or complex grievances.

Composition of GRC (PIU C&W):

Designation/Organization	Position in PIU GRC
PD PIU C&W	Head/convener of GRC
DD E&S PIU C&W	Secretary of GRC
DD Procurement Specialist PIU C&W	Member
Tehsil/District Focal Person	Member
Contractor	Member
Community Representative(s)	Member
Environment/Social/Gender Specialist, Meinhardt Consultant, PIU C&W	Observer
Co-opted/Invited member(s) E.g. complainant, lawyer, relevant govt. Official, etc	Member/Observer

Composition of the GBV GRC (PIU C&W):

Composition	Status
Project Director, PIU C&W, KP-RIISP	Chairman
Deputy Director, Procurement Specialist, PIU C&W, KP -RIISP	Secretary / Member
Deputy Director, (E&S), PIU C&W, KP-RIISP	Member
Gender Specialist (Female), Meinhardt Consultant, PIU C&W, KP-RIISP	Observer
Social Specialist, Meinhardt Consultant, PIU C&W, KP-RIISP	Observer
Any Co-opt member	Member/observer

Working Arrangements:

GRC meeting will be held at the PIU or any other location agreed by the Committee. If needed, GRC members may undertake field visits to verify and review the dispute issues.

If the affected person is not satisfied with the decision of GRC at PCMU, then it can be referred to the Project Steering Committee for resolution. If the complainant does not accept the resolution, or chooses to accept it, this will be confirmed in writing. The complainant may also seek redress through courts or other mechanisms available in case of non-acceptance.

GRM Awareness and Capacity Building

- Awareness sessions will be conducted for laborers, contractors, local communities, and other stakeholders.
- Orientation on GRM channels, procedures, and available support will be integrated into community consultations and labor inductions.
- GRM posters, brochures, and contact details will be displayed at all construction and project sites.

6.4 Capacity Building and Training

To raise the level of professional and managerial staff, there is a need to upgrade their knowledge in the related areas. The SC will play a key role in this respect and supervise the arrangements for training.

The contractor's environmental awareness and appropriate knowledge of environmental protection is critical to the successful implementation of the EMP, as without appropriate environmental awareness, knowledge, and skills required for the implementation of the mitigation measures, it would be difficult for the contractor's workforce to implement effective environmental protection measures. A suitable training program is proposed to train the Contractor's staff who will be involved in the Construction Phase and the professional staff from the client involved at the operational stage of the project. The details of this training program are presented in Table 8 below.

Table 8: Personnel Training Program

Provided by	Contents	Trainees/Events	Duration
Consultants/ organizations Specializing in environmental management and monitoring	Short training session, on: Environmental laws and regulations, daily monitoring and supervision	Two training sessions, one For PIU staff and one for Contractor project staff	2 Days
Consultants/ organizations specializing in Occupational health and Safety	Short lecture relating to Occupational Safety and Health	One seminar for contractor's staff	1 Day
Consultants/ organizations specializing in Grievances Redressal Mechanism	Training session on What is GRM, and how It's working, and who to be approached for redressal of complaint, and awareness session on GBV& SEA/SH and its associated elements.	One session for the Surrounding community.	1 Day

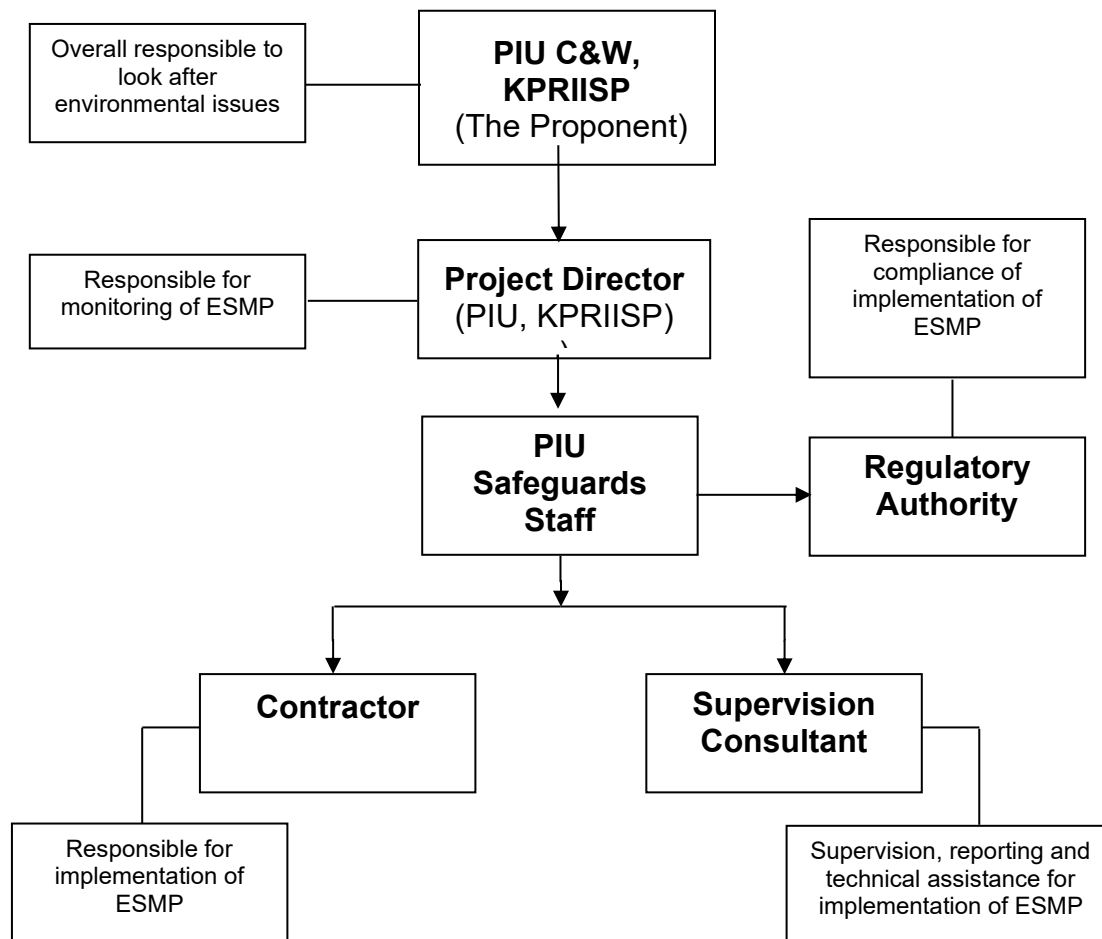
6.5 Institutional Arrangements and Roles

The main purpose of the ESMP is to provide a strategy for environmental protection. According to ESMP, all the activities associated with the project will be controlled and monitored during the design, construction, and operation phases. ESMP will propose a plan of action that will indicate responsibilities and required measures to prevent or minimize the potential environmental impacts.

The following functionaries will be involved in the implementation of ESMP:

- Project Implementation Unit (PIU);
- Supervision Consultant's Environmental Engineer;
- Contractor's Site Environmental Engineer; and
- EPA, KP (Regulatory Authority)

The organizational set-up for the implementation of ESMP is shown in **Figure 1** below. **Figure 1: Organizational Setup for Implementation of ESMP**



The PIU C&W will be overall responsible for the implementation of this ESMP and the environmental management and supervisory affairs during the construction phase of the proposed project. For effective environmental management, the PIU will assign the necessary responsibilities through the Project Director to an Environmental Expert and a Social Expert in implementing the mitigation measures proposed in the ESMP. The PCMU will monitor the overall implementation of the respective ESMP to make sure all the recommended protective and safety measures are implemented in its letter and in spirit.

The ESMP will be part of the Bidding documents for the bidding process once all the formalities of the approvals of the subproject are completed. On mobilization of the contractor for the subproject implementation, the contractor will

prepare and submit the Contractor Social Management Plan (CESMP) to the PIU. The Contractor will be responsible for the implementation of ESMP under the Supervision Consultant. The Contractor shall be bound to follow the provisions of the Contract documents, especially regarding environmental protection, and apply good construction techniques and methodology without damaging the environment. The Contractor must safeguard, mitigate adverse impacts, and rehabilitate the environment should be addressed through environmental provisions in the Contract document and through adequate implementation at the site. The Regulatory Authority will be responsible for the compliance with the implementation of ESMP.

6.5.1 Project Implementation Unit (PIU)

Design and Construction of the project is the core responsibility of PIU, C&W. The major role and responsibilities related to environmental and social tasks are as follows:

- To ensure that the Project design and specifications are adequately reflected in the ESMP.
- To ensure the Project's compliance with the environmental regulations and donor requirements.
- Setting up systems for environmental management.
- Ensuring that the Contractor(s) develop their own, and carry out, Environmental Management Plan that are consistent with the ESMP;

6.5.2 Responsibilities of the Environmental Engineer of the Supervision Consultant

The Environmental Engineer (EE) of the Supervision Consultant (SC) will oversee the performance of the Contractor through periodic monitoring to make sure that the Contractor is carrying out the work following ESMP.

The EE of SC will provide guidance to the Contractor's Environmental Engineer for implementing each of the activities as given in the ESMP. The EE of SC will be responsible for record keeping, providing instruction through the Resident Engineer (RE) for corrective actions, and ensuring compliance with various statutory and legislative requirements. The EE will maintain close coordination with the Contractor and PIU for the successful implementation of environmental safeguard measures. However, the overall responsibilities of the EE of SC are as follows:

- Directly reporting to the RE;
- Discussing various environmental issues and environmental mitigation, enhancement, and monitoring actions with all concerned directly or indirectly;
- Inspect, supervise, and monitor all the construction and allied activities related to the EMP for the project
- Assist the RE to ensure the environmentally sound engineering practices;
- Assisting the contractor and PIU in all matters related to public contacts, including public consultation on environmental and community health & safety issues;
- Assisting PIU Safeguards staff to carry out environmental monitoring;
- Organizing training for the EE of Contractor and field staff; and
- Preparing and submitting monthly and quarterly environmental progress/ compliance reports to the PIU.

6.5.3 Responsibilities of the Environmental Engineer of the Construction Contractor

The Site Environmental Engineer of the Construction Contractor will carry out the implementation of mitigation measures at the construction site. The Construction Contractor will be bound through the Contract documents to appoint the Site Environmental Engineer with a relevant educational background and experience. Responsibilities of the EE of the Contractor are as follows:

- Preparing sub plans, including monitoring plan, traffic control/diversion plan, site rehabilitation plans, etc., and will submit all the plans to the EE of SC.
- Implementation of ESMP and taking effective measures against the corrective actions plan;
- Preparing the compliance reports as per the schedule and will submit them to the SC;

- Providing proper Personal Protective Equipment (PPEs) to the workers and training them for their proper use; and
- Providing environmental and health & safety training to the workers /labor.

6.6 Labor Camp Management

Campsite will be selected in consultation with the District Administration, PIU C&W at a suitable location within the selected subproject site, once the contractor is mobilized on site on an adequate area for establishing camp sites, including parking areas for machinery, stores, and workshops, access to local markets, and an appropriate distance from sensitive areas and existing residences in the vicinity, the specific details of the labor camp management are provided in Annexure 12. It is anticipated that around 20-25 laborers will be present at the camp during the construction phase of this subproject. The area required for construction camps will depend upon the deployed manpower and the type and quantity of machinery mobilized; however, the estimated area required is 1000-1500 square yards for each campsite. Given the required area, two probable sites have been identified and locations shown in Map 1 of Annex 6. However, CESMP (CESMP will be prepared by the contractor before the start of construction) and other local considerations will be considered before the final selection of the campsite.

6.7 Occupational Health and Safety

Occupational Health and Safety (H&S) related impacts will arise during construction stage activities, including clearing of earth, levelling, compaction, pavement finishing, and testing & commissioning. The falls during inspection or maintenance of pile rigs, steel fixing bridges, framework erection, and other related activities may also occur. Eye injury can be caused by stone or metal particles. The hazards of being hit by falling objects, major hand-arm and whole-body vibration hazards, skin and respiratory tract irritation from exposure to cement dust, overexertion, awkward postures, etc., will be another impact. Welding hazards include electric shock, fumes and gases, fire and explosions, falls from height, eye and head injuries, etc. The contractor will take all protective measures and provide the Personal Protective Equipment to the laborers during the construction to minimize the OSH risks and ensure the safety of the laborers at the site. The contractor will prepare a Site Specific OH&S plan; the main components of the plan are provided in Annexure 13, and submit it to PIU. Strict monitoring by the PIU and the Supervision Consultant team will be conducted during the construction stage to ensure compliance with the ESMP mitigation and safety measures.

6.8 GBV/SEA/SH Risk Mitigation:

To mitigate risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), the contractor will develop a site-specific Code of Conduct (CoC) and Grievance Redress Mechanism (GRM) in line with the approved KPRIISP GRM Manual (May 2025). These documents will be submitted to the PIU for review and approval within 30 days of contract signing and prior to the commencement of civil works.

The CoC will be signed by all workers, including subcontractors, and refresher GBV/SEA/SH awareness trainings will be conducted regularly. KPRIISP Code of Conduct (GBV and SEA/SH Prevention) is attached as Annex-11.

The GRM will include confidential reporting channels and survivor-centered protocols for handling GBV-related complaints.

The PIU will monitor compliance, maintain oversight of CoC implementation, and facilitate referral of survivors to appropriate support services.

6.9 Budget for ESMP Implementation

Environmental Monitoring is undertaken during both the construction and operational phases to ensure the effectiveness of the proposed mitigation measures. Certain environmental parameters are selected, and quantitative & qualitative analyses are carried out. The results of the analysis are compared with the guidelines, standards, and pre-project conditions to investigate whether the EMP and its implementation are effective for the mitigation of impacts or not. This section discusses parameters to be analyzed during the project's construction and operation,

responsibilities for monitoring and reporting, and monitoring costs. Tables 9 to 13 below provide the respective monitoring to be conducted during the subproject development phases: the Pre-Construction Phase, Construction, and Operation Phases.

Table 9: Cost Estimates for 'Pre-Construction Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Air Quality	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} , and PM ₁₀	3 (1 time at 5 locations)	90,000	3 readings @ PKR 30,000 per sample
Noise Levels	dB(A)	3 (1 time at 5 locations)	90,000	3 readings @ PKR 30,000 per reading
Ground Water Quality	NEQS	3 (1 time at 5 locations)	90,000	2 readings @ PKR 30,000 per sample
Contingencies			27,000	10% of the monitoring cost
Total (PKR)			297,000	

1. For air quality monitoring: 'Passive samplers', such as test tubes, can be used, or 'Active samplers' with sorbent tubes can also be used.
2. For noise monitoring, sampling equipment with a duration greater than 1 hour can be used.

Table 10: Cost Estimates for 'Construction Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Air Quality	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} , and PM ₁₀	12 (Quarterly basis at 5 locations)	360,000	12 readings @ PKR 30,000 per sample
Noise Levels	dB(A)	12 (Quarterly basis at 5 locations)	360,000	12 readings @ PKR 30,000 per reading
Ground Water Quality	NEQS	8 (Quarterly basis at 5 locations)	240,000	8 readings @ PKR 30,000 per sample
Contingencies			67,200	7% of the monitoring cost
Total (PKR)			1,027,200	

Table 11: Cost Estimates for 'Operation Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Waste Management	Solid Waste	Quarterly	200,000	Four times @ PKR 50,000
Total (PKR)			200,000	

Table 12: Cost Estimates for Environmental Mitigation

Activity	Basis	Cost (Rs.)
Medical screening for workers	Rs. 5000 per employee, and for 30 employees	150,000
Material Storage, handling, and use	Three (03) No. of tarpaulins of Rs. 25,000 each	75,000
Handling of hazardous waste and safe storage	Lump sum cost of the containers, marking, and safe storage before disposal.	500,000
Handling/ transportation of hazardous material	Rs. 30,000/month for 12 months will be required for the transportation of materials	360,000
Asbestos material screening, storage, and management.	The cost includes screening, handling, storage, transportation, and disposal.	1,500,000
Handling of solid waste	Rs: 21,000 per month (three trips per month) for 12 months, which includes the cost of collection, transportation, and disposal to the designated site. It includes the cost of 3 dustbins to be placed at the construction site.	270,000
Cost of Personal Protective Equipment (PPE)*	For 30 employees for the provision of dust masks, safety shoes, gloves, a first aid box, ear plugs	1,176,000
Cost of environmental training	Lump sum	550,000
Disease Management Cost	Lump sum	400,000
Grand Total		4,981,000

Table 13: Cost Estimates and Break-up of Personal Protective Equipment (PPEs)

Items	Quantity	Cost / Item (Rs.)	Total Cost (Rs.)
Dust masks	3600	20	72,000
Safety Shoes	150	2000	300,000

Gloves	1,800	300	540,000
Safety Helmet	50	900	45,000
First Aid Box	3	8000	24,000
Ear Plugs	1200	30	27,000
Total			1,008,000/-
Time required for Construction = 36 months			
Number of laborers required during construction = 25			
Dust mask	1 dust mask to be used for a week by each laborer		
Safety Shoes	1 safety shoe for six months for each laborer		
Gloves	2 pairs of gloves for each laborer for a month		
Safety Helmet	1 Safety Helmet for each laborer for 18 months		
First Aid Box	1 first aid box at each work site within the subproject site		
Ear Plug	1 set of earplugs to be used for 1 month for each laborer		

Table 14: Total Cost for ESMP Implementation

Serial No.	Activity	Cost in PKR
1.	Cost Estimate for 'Pre-Construction Phase' Environmental Monitoring	297,000/-
2.	Cost Estimate for 'Construction Phase' Environmental Monitoring	1,027,200
3.	Cost Estimate for 'Operation Phase' Environmental Monitoring	200,000/-
4.	Cost Estimate for Environmental Mitigation Cost	4,981,000/-
5.	Cost Estimate and Breakdown of PPEs	1,008,000
6.	Cost Estimate for Environmental Engineer, with intermittent input of 9-man-months @ PKR 150,000/ per month.	1,350,000/-
	Total	8,863,200

6.10 Reporting Requirements

6.10.1 Monitoring and Reporting Responsibilities

An ESMP can only be effective if it is regularly monitored and the results are reported to the appropriate authority, ensuring that the proposed mitigation measures are properly implemented on the ground, an environmental monitoring checklist is placed at Annexure-3. Monitoring and reporting of outcomes are shared responsibilities among all project partners. The roles and responsibilities for monitoring and reporting are distributed among the partners as follows:

- **Implementing Agency/Contractor:** Responsible for daily/weekly environmental and social monitoring and internal reporting.
- **Supervisory Consultants:** Responsible for reviewing contractor reports and submitting periodic consolidated reports to the project management unit.
- **Environmental and Social Specialists:** Oversee proper ESMP implementation and conduct spot checks.

6.10.2. Types of Reports Required

The table below outlines the types of reports to be prepared, their required frequency, their intended purpose, and the parties responsible for their preparation and submission.

Table 15: Types, frequency and purpose of reports

Serial No	Report Type	Frequency	Purpose	Responsible Party
1	Daily Site Report	Daily	To monitor compliance with ESMP mitigation measures on-site	Contractor
2	Weekly Monitoring Report	Weekly	Summarizes environmental and social performance, any incidents or complaints	Contractor
3	Monthly Progress Report	Monthly	Overview of ESMP implementation, mitigation actions, non-compliance, and grievances	Contractor
4	Quarterly Environmental and Social Monitoring Report (ESMR)	Quarterly	Comprehensive review of ESMP performance indicators and compliance	Supervising Consultant
5	Incident/Accident Report	As needed	Immediate reporting of major incidents, including GBV & SEA/SH affecting the environment or community	Contractor and Supervising Consultant
6	Grievance Redress Reports	Monthly	Track grievances received, status of resolution, and time taken	Grievance Redress Mechanism (GRI focal point)

6.10.3. Stakeholder Reporting

An effective stakeholder reporting process ensures transparent communication, fosters accountability, and keeps all relevant parties informed about the project's progress, challenges, and compliance with environmental and social safeguards. In accordance with the approved KP RIISP SEP (March 2023), reporting will be conducted as follows:

Key Stakeholders for Disclosure:

- Project Management: PCMU (P&D Department) and PIUs (Line Departments).
- Regulatory/Oversight: World Bank and EPA KP.
- Local Authorities: Local Government Department (LGERDD), District Administrations, and Village/Neighborhood Councils (VC/NCs).
- Communities: Project Affected Parties (PAPs), Vulnerable Groups, and Residents.
- Civil Society: NGOs, CSOs, and Academia.

Reporting Mechanisms & Frequency:

- Monthly: Summaries of public grievances, inquiries, and incidents will be collated and reported to senior project management.
- Bi-Annual: Comprehensive progress reports on SEP implementation and environmental/social performance will be shared with the PCMU and the World Bank.
- Six-Monthly (Feedback Loop): Information on public engagement activities and project updates will be conveyed to community stakeholders through infographics, the project website, and digital messaging (e.g., WhatsApp).
- Public Consultation Records: Detailed records of all consultations (FGDs, consultations) must be maintained, transcribed, and included in the periodic reports.

6.10.4. Emergency and Contingency Reporting

In addition to regular ESMP monitoring and reporting, additional reports must be prepared by the contractor Environmental Engineer and submitted to PIU/PCMU in the event of emergencies, an Incident Report Form is attached at Annexure-5. These may include, but are not limited to, the following:

- Immediate notification of:
 - Hazardous material spills
 - Significant ecological damage
 - Social unrest
- Submit a detailed incident report within 24–48 hours

Annex 1. EPA Environmental Assessment Rules



GOVERNMENT OF THE KHYBER PAKHTUNKHWA FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT

NOTIFICATION

Dated Peshawar the, 02nd September, 2021

No. SO (Envf)/FE&WD/1-29/2021/Vol-II. In exercise of the powers conferred by section 31 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014 (Act No. XXXVIII of 2014) read with section 13 thereof, the Government of Khyber Pakhtunkhwa is pleased to make the following rules, namely:

THE KHYBER PAKHTUNKHWA ENVIRONMENTAL ASSESSMENT RULES, 2021.

1. Short title and commencement.---(1) These rules shall be called the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021.

(2) They shall come into force at once.

2. Definitions.---- (1) In these rules, unless there is anything repugnant in the subject or context;

- (a) **“Act”** means the Khyber Pakhtunkhwa Environmental Protection Act, 2014 (Khyber Pakhtunkhwa Act No. XXXVIII of 2014);
- (b) **“Director-General”** means the Director-General of the Khyber Pakhtunkhwa Environmental Protection Agency;
- (c) **“Environmental Assessment Advisory Committee”** means the Committee constituted under rule 23 of these rules;
- (d) **“EIA”** means an Environmental Impact Assessment as defined in clause (s) of section 2 of the Act;
- (e) **“GEA”** means as General Environmental Approval to be submitted with the Agency by proponent, which are not covered by Environmental Impact Assessment or Initial Environmental Examination;
- (f) **“GIS”** means Geographic Information System;
- (g) **“GPS”** means Global Positioning System;
- (h) **“IEE”** means an Initial Environmental Examination as defined in clause (ff) of section 2 of the Act; and
- (i) **“Schedule”** means a Schedule appended to these rules.

(2) Words and expressions used in these rules but not defined shall have the same meanings as are assigned to them in the Act.

3. Application for screening and scoping of project.--- The proponent shall file an application with the Agency, having project description or activities on attached proforma as specified in **Schedule-I** to get clear directives for screening and scoping of the project, as per rule 4.

4. Projects requiring an EIA or IEE or GEA.---Where the project falls with the categories mentioned in **Schedules-II, III and IV**, the proponent shall file EIA or IEE or GEA respectively, with the Agency.

5. Directions for a specific project.---Where the project does not fall within the categories as mentioned in **Schedule-II, III and IV** and the Agency is of the opinion that said project may create an environmental hazard, the Agency shall direct the proponent to file an EIA, IEE or GEA, as the case may be, for reasons to be recorded in such directions:

Provided that such directions shall not be issued without the recommendations in writing of the Environmental Assessment Advisory Committee.

6. Preparation of guidelines for EIA, IEE and GEA.--- Guidelines for preparation of EIA or IEE or GEA of general and sectoral applicability may be specified by the Agency; provided that such guidelines may indicate specific assessment requirements for planning, construction and operation of a project relating to a particular sector.

7. Review Fees.---The proponent shall pay, at the time of submission of an EIA or IEE or GEA, a non-refundable review fee to the specified account of the Agency, as per rates given in **Schedule-V**.

8. Filing of EIA, IEE and GEA.--- (1) The proponent shall file ten paper copies and two electronic copies of an EIA or IEE with the Agency.

(2) Every EIA or IEE shall be accompanied by--

- (a) an application, in the form set out in **Schedule-VI**, and
- (b) original receipt of the review fee slip.

(3) The process for filing the GEA shall be the same as mentioned in sub-rule (1) and (2) except one hard and electronic copy of the report shall be submitted with the Agency.

9. Preliminary scrutiny.---(1) Within ten (10) working days of filing of the EIA, IEE or GEA, the Agency shall,-

- (a) confirm that the EIA, IEE or GEA is complete for purposes of initiation of the review process and issue confirmation letter to the proponent; or
- (b) require the proponent to submit such additional information as may be specified at any stage during the review process; or

SCHEDULE-VI
(see rule 8 (2) (a))

Application Form

1	Name and Address of Proponent -----	Phone: ----- Fax: ----- Telex: -----										
2	Description of project----- -----											
3	Location of project and GPS Coordinates/GIS map:-----											
4	Objectives of Project:-----											
5	IEE/EIA/GEA attached? EIA/IEE/GEA	Yes/No										
6	Have alternative sites been considered and reported in EIA/IEE/GEA?	Yes/No										
7	Existing land use Is basic sites data (Only tick yes if the available, or has it been data is reported in measured? the EIA/IEE/GEA)	Land Requirement										
8	Meteorology (including rainfall) Ambient air quality Ambient Water Quality Ground Water quality	<table border="0"> <tr> <td><u>Available</u></td> <td><u>Measured</u></td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> </table>	<u>Available</u>	<u>Measured</u>	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No
<u>Available</u>	<u>Measured</u>											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
9	Have estimates of the following been reported	<table border="0"> <tr> <td><u>Measured</u></td> <td><u>Reported</u></td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> </table>	<u>Measured</u>	<u>Reported</u>	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No		
<u>Measured</u>	<u>Reported</u>											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
10	Source of power	Power Requirement										
11	Labour force (number)	Construction: Operation:										

Verification: I do solemnly affirm and declare that the information given above and contained in the attached IEE/EIA/GEA is true and correct to the best of my knowledge and belief.

Date _____

Signature, name and
Designation of proponent
(with official stamp/seal)

SCHEDULE-IX
(see rule 13)

Decision on GEA

1. Name and address of proponent _____
2. Description of project _____
3. Location of project and GPS Coordinates/GIS map. _____
4. Date of filing of GEA _____
5. After careful review of the GEA, and all comments thereon, the Agency has decided

(a) to accord its approval, subject to the following conditions:

or

(b) that the proponent should submit a GEA with the following modifications-

or

(c) that the proponent should submit an IEE of the project, for the following reasons:-

or

(d) to reject the GEA report of the project, being contrary to environmental objectives, for the following reasons:

[Delete (a)/(b)/(c)/(d), whichever is inapplicable]

Dated _____ Tracking no. ____

Director-General Agency (with official stamp/seal)

SO (Envt)/FE&WD/1-29/2021/Vol-II/

Dated 02-09-2021

Copy forwarded to the:

1. Principle Secretary to Governor, Khyber Pakhtunkhwa.
2. Principle Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. All Administrative Secretaries, Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa.
5. All Commissioners, Khyber Pakhtunkhwa.
6. All Heads of Attached Department, Khyber Pakhtunkhwa.
7. Chairman Environmental Protection Tribunal, Peshawar.
8. All Deputy Commissioners, Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. PSO to Chief Secretary, Khyber Pakhtunkhwa.
11. PSO to Chief Minister, Khyber Pakhtunkhwa.
12. Director General, Environmental Protection Agency, Khyber Pakhtunkhwa, Peshawar **with the request to depute a representative to collect 100 gazatted copies of the Notification from Government Printing Press.**
13. Director Information, Khyber Pakhtunkhwa.
14. Chief Executive Officer, WSSP, Peshawar.
15. Manager, Government Printing Press for publication in next official gazette. **He is requested to provide 100 Gazatted copies of the same for information and record.**
16. Section Officer (Cabinet), w/r to his letter No. SOC(E&AD)/13-3/through circulation/21 dated 01-09-2021
17. PS to Secretary Forestry, Environment and Wildlife Department, Khyber Pakhtunkhwa.
18. Master file.

(Muhammad Qasim)
Section Officer (Environment)

Screening Form

Subproject: District & Residential Complexes, Ghalani Mohmand
 Project Implementation Unit (PIU): Communication & Works Department (C&W)
 Consulting Firm: Meinhardt International Pakistan



Name of the person who conducted the screening: Hameed Hasan,
 Position of the person who conducted the screening: Senior Environmental Specialist,
 Meinhardt International Pakistan
 Date of screening: June 10, 2025.

The E&S Screening procedure comprises two stages: (1) Initial screening by using the **Exclusion List** in Table 5 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of the screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	District & Residential Complex Ghalanai, District Mohmand
Subproject Location	The proposed new District complex in Ghalanai, Mohmand District, is located within the existing Government Colony in Tehsil Ghalanai on the main Mohmand Agency Road. The site is approximately 400 meters from the Ghalanai Bazaar. The Government Colony site in Tehsil Ghalanai has been owned by the respective District Government for approximately 50 years.
PIU in Charge	Communications & Works (C&W).
Estimated Cost	Not known at this time. Will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new District complex will be built on 3 different plots. The specific area of each of the plots is: Plot No. 1 is 9.14 kanals in size (District Complex), Plot No. 2 is 4.70 kanals in size (Officers' Mess), and Plot No. 3 is 10.70 kanals (Residential Complex). The new District Complexes office building is a multistoried, ground+2-storied building. The multistorey building provides Offices with allied facilities for the District Administration staff and visiting general public. The proposed new building will include Offices, public waiting areas (for both male and female visitors), public washrooms (for both males and females), kitchens on each floor, and circulation areas for easy access and circulation of officials and the public. In addition to the new office facilities, the proposed complex will include accommodation facilities for District Administration staff. The residential facilities will include Officers' residences, 3 and 2-bedroom apartment buildings and one G+1 story building for the Government Officers' mess. Also, around the multistoried buildings block and along the access road, green areas with plantation will be developed to increase the plantation and aesthetics of the proposed complex.

2. Environmental and Social Screening Questionnaires

Questions	Answer	Remarks
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	Yes	No	
ESS1: Assessment and Management of Environmental and Social Risks and Impacts			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented, that trigger the 'Ineligible Activities' or other exclusion criteria?		No	The proposed subproject will have moderate environmental impacts, which can be easily mitigated on-site by adopting proper protective measures.
Questions 2 and 3 below are examples. These two are critical questions in the Screening Form, as they will determine whether a sub-project can use pre-prepared ESCOPs (Environmental and social commitment plans) or needs to prepare a site-specific ESMP. If all the sub-projects are expected to be low risk, then all sub-projects may be able to use the pre-prepared ESCOPs. However, if there are some sub-project activities, such as the construction of community bridges, which may pose a moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project activities in your project and separate those that may be low risk and those that may be moderate risk. 2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads with ramps, elevators and tactile paths to accommodate persons with disabilities and the elderly), community centers, schools, bridges and jetties?	Yes		The proposed subproject involves the new construction of office buildings and residential facilities for the District Administration of Ghalanai, Mohmand District. Additionally, it involves the demolition of a structurally damaged existing building on plot no. 3, to make available the required space for the new proposed building.
3. Does the subproject involve the <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?		No	The proposed subproject will involve the construction of new office buildings and residential facilities with all the basic and allied facilities for the offices and residences.
4. Will construction or renovation works require new borrow pits or quarries to be opened?		No	No new borrow pits or quarries for the construction materials like sand and aggregate, required for the construction, will be needed as the material will be brought from the existing licensed and approved borrow pits and quarries in the surrounding vicinity. There are government-licensed existing borrow pits located approximately 3-4 km from the project subprojects, and they will be utilized for the construction material. The proposed ESMP will include E&S screening of the proposed Quarry site that will be used to supply material for the construction of the Complex. The Quarry license will be attached to the proposed ESMP.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹		No	The site for the subproject is already within a Government Colony and will not lead to any risks or negative impacts on individual groups or communities.
ESS2: Labor and Working Conditions			

¹ "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		No	The construction works will be contracted out to approved Government contractors through an open bidding process. Government-approved contractors are those that fully abide by the existing labor laws of the country that prohibit child and forced labor. The National Identity Cards (CNICs) will be ensured with the labor at the time of hiring and kept as record for monitoring.
7. Does the subproject involve recruitment of a workforce including direct, contracted, primary supply, and/or community workers?	Yes		All the non-skilled labor will preferably be hired locally (The contractor will be guided); however, if skilled labor is not available, it can be engaged from other areas. This will be further elaborated in the LMP that would be part of ESMP. Both Contractor and SC will monitor the compliance.
8. Will the workers be exposed to workplace hazards that need to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work?	Yes		There are chances that the workers during construction and demolition activities are exposed to workplace hazards like dust, loud noise, and other hazards. These will be managed according to GOKP labor regulations and WB EHSs, and the contractor will provide the necessary PPE to the workers. All mandatory OHS requirements will be ensured.
9. Is there a risk that women may be underpaid when compared to men when working on project construction?		No	Generally, in Khyber Pakhtunkhwa and particularly in the merged districts, no female workers are involved in the construction activities, so underpayment to female workers will be irrelevant.
ESS3: Resource Efficiency and Pollution Prevention and Management			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?	Yes		The new construction will generate solid and liquid waste, but it will be handled and safely disposed of regularly from the site in available natural depressions around 2 km from the subproject site suitable for the construction waste disposal. The process of handling and safely disposing of both liquid and solid waste should be strictly monitored by the construction supervision consultants and the implementation agency to ensure it does not adversely impact the surrounding environment and the nearby communities.
11. Whether the subproject construction will use any community resources (water, sand, and gravel) and whether there is a risk of depleting these resources.	Yes		For the construction of the subproject, the water requirement will be met through surface water source of Ghalanai Khwar located at the around 1.5 km. For sand and gravel, the existing licensed borrow pits in the nearby vicinity will be used. All the resource bases can provide the required material without compromising the community's existing needs, and this will be strictly monitored during the construction phase. During the construction stage, stakeholders' coordination and engagement

			will be maintained regularly to avoid any resource-related concerns, and the proposed ESMP will give clear means of communication with each group of stakeholders. In addition, a detailed GRM will be available to stakeholders to voice their potential concerns.
12. Do any of the construction works involve the removal of asbestos or other hazardous materials?	Yes		The proposed complex will be built on various selected plot sites, and all of them are located within the Government Colony compound. There are likely chances of old water supply and sewage pipelines of Asbestos pipes. On the site, for very old buildings, the drawings record showing the water supply and sewage pipes is not available to determine the existence and location of such pipes at the site. However, during the construction, once such pipes are found these will be carefully removed, properly stored, and safely disposed of to avoid any risks to workers and surrounding communities. The proposed ESMP of the project will provide the required detailed mitigation and protective measures. The services of the trained technical personnel will be hired for the safe management of Asbestos pipes. The budget of ESMP will include the required cost for the safe management of Asbestos, if it is present at the site.
13. Are works likely to cause significant negative impacts to air and / or water quality?	Yes		During the construction of buildings, chances exist for a moderate level of negative impact on the ambient air quality and underground water quality of the site and its immediate surrounding areas. Before the start of construction, ambient air quality and underground water tests will be conducted to establish the baseline. In the proposed ESMP, a set of protective and mitigation measures, for example, to avoid dust particulate matter entry in the air, regular water spraying of the area will be suggested. Later, at regular intervals, these tests will be performed to monitor the quality of the ambient air and water and to monitor the implementation of the ESMP. During the pre-construction stage, an awareness campaign will be conducted with residents to inform them about potential risks, the proposed measures, and complaint registration provisions in the proposed GRM. This aims to promote understanding and prevent such risks. In case of violation of the agreed mitigation, how and where to report it.
14. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?		No	The selected plot no. 3 has an existing building, and has septic tanks arrangement for the wastewater discharge. However, the

			available infrastructure has very limited capacity and will not be able to take the load of the proposed buildings. Therefore, for the proposed complex buildings, a new separate system of septic tanks with soakage pits will be constructed to accommodate the future sewage flow and safe disposal of the treated wastewater.
15. Is there any potential to have an impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture-related activities, seed and fertilizer assistance, procurement of pesticides)?		No	No agrochemicals like pesticides will be used during the construction process. However, at the foundation level, "Anti-termite" spray will be used to protect the building components from termites in the future. The quantity, handling, and method of spraying will be strictly monitored at the site to avoid any negative impact on the soil and water. In addition, before the use of Anti-termite spray, the surrounding community will be informed, and safety signage will be displayed, and the specific area will be restricted to protect the potential health risks.
ESS4: Community Health and Safety			
16. Is there a risk of increased community exposure to communicable diseases (such as COVID-19, HIV/AIDS, and Malaria), or an increase in the risk of traffic-related accidents?		No	The risk of increased community exposure to communicable diseases (such as COVID-19, HIV/AIDS, and Malaria) is considered low, as the construction workers' camp will be located within the subproject site, and worker movement will be largely within the worksite. Appropriate health and hygiene measures will be implemented as per the ESMP to further minimize any risk of disease transmission. Regarding traffic-related risks, a site-specific Traffic Management Plan will be developed and included in the ESMP to ensure safe vehicular movement. Construction-related traffic will be limited to designated routes and specific time windows to avoid peak community traffic hours and minimize disturbance to local residents.
17. Is an influx of workers, from outside the community, expected? Would workers be expected to use the health services of the community? Would they create pressure on existing community services (water, electricity, health, recreation, and others?)	Yes		During the construction process, around 25-30 construction workers will be present at the labor camp. The site of the labor camp will be provided in the proposed ESMP, and additional mitigation measures will be provided once the location of the camp is finalized. The mitigation measures will be provided in the ESMP. In the cases of accidents and other emergencies, they will use the existing health facility present in the area. For water supply and electricity, the contractor will be making his own arrangements to provide such services to their workers.

18. Is there a risk that SEA/SH(Sexual Exploitation and Abuse, and Sexual Harassment)) may increase as a result of project works?	Yes		Although the worker's campsite will include supervisory staff to protect against such incidents, a risk does exist. The project will follow the Labor Management Procedures prepared under ESS2 and the GBV/SEA Mitigation Plan prepared under ESS4 and ensure Contractor and labor sign the GBV/SEA/SH Code of Conduct and are provided training and awareness on this issue to assist in preventing any GBV incidents. The Occupational Health and Safety (OHS) measures and mitigation steps will be included in the proposed ESMP" to ensure worker wellbeing and minimize risks to the host community.
19. Would any public facilities, such as schools, health clinics, or places of worship be negatively affected by construction?	Yes		There are 3 schools and one hospital in the colony where the buildings of the proposed complex will be constructed. Two schools and the hospital are located at a distance of around 250 meters in different locations within the colony and have separate access to them. One school is located opposite across the main road to Plot no. 5, at a distance of around 100 meters, where the residential buildings are proposed. Special measures will be adopted to not disturb the education process, ensure the safety of the students, teachers, visiting and admitted patients, and health staff. These measures will ensure the safety of students (like not allowing labor access to the school's area and vice versa, fencing (or gating) the construction area to ensure no intrusion, installing signage warning against trespassing into school, etc). In addition, measures like not using noise-producing machinery and equipment during school timings, and all loading and unloading of construction material will not be allowed at school timings. The location of these facilities is shown on the site map of the site.
20. Will the subproject require the government to retain workers to provide security to safeguard the subproject?	Yes		Some of the construction workers will be camped inside the site with the prior approval of the administration for security purposes.
21. Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war?		No	The proposed subproject site is in a declared Government Colony for approximately last 50 years and is inhabited by the Government Officials of the former Mohmand Agency, and now by the District Administration. Therefore, the site is not in an active conflict zone.

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

22. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?		No	The proposed subproject site's land is owned by the District Administration and is Government Land, so no involuntary acquisition of new land will be required.
23. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?		No	On plot no.3, there is an existing building with a major portion structurally damaged in a previous blast, and lying empty. A few rooms of this building are ok, and the Deputy Commissioner's office staff (60 officials) are having their offices in them. The District Administrations will be arranging the alternate office accommodation for their staff during the construction of the new office accommodation.
24. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?		No	As mentioned above, the subproject site is vacant land with no temporary or permanent physical displacement taking place; therefore, no chance of economic displacement of any community, group, or individual.
25. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?		No	The proposed subproject site land has been owned by the Government for approximately 50 years, and has established the official Government Colony compound for the former Mohmand Agency here.
26. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?		No	The existing compound already has these facilities, and therefore, the proposed Office Complex will use these existing services. However, some improvement and rehabilitation of existing services will be done, but no new land acquisition will be required.
27. Is private land required for the subproject activity being voluntarily donated to the project?		No	No private land acquisition is involved, whether voluntary or involuntary, as the Government owns the proposed subproject site.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
28. Does the subproject involve activities that have the potential to cause any significant loss or degradation of critical habitats ² whether directly or indirectly, or which would lead to adverse impacts on natural habitats ³ ?		No	The proposed subproject site is not situated in or near any critical or natural habitats; therefore, it would not have any adverse impacts on them.
29. Will the project involve the conversion or degradation of non-critical natural habitats?		No	The proposed subproject will involve the construction of an office building complex within a defined area.
30. Will this activity require the clearance of trees, including inland natural vegetation?		No	The proposed subproject complex will be built on different plots, and some of the plots

² Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

³ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

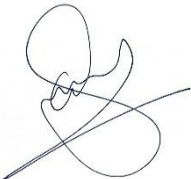
			have trees. There are approximately 60 large trees and 70 shrubs, and flowering plants in and around the proposed plots of the District and Tehsil Complex site. The trees are of various kinds, like Chir Pine (<i>Pinus roxburghii</i>), Black Mulberry (<i>Morus nigra</i>), Babul/Acacia (<i>Acacia nilotica</i>), Cypress, and Eucalyptus. More than 50% of trees are of Eucalyptus. The placement of buildings within the selected plots will be developed keeping in view the existing trees' location at the site, and the proposed new buildings will be placed in such a manner as to affect a very minimum number of existing trees, only those that will be on the site of the proposed new buildings. The actual number of trees to be affected will be determined once the layout plan of the proposed new buildings is plotted on the ground before the execution plan of the foundations. The kind and number of trees to be cut down will be replaced with 7 or 10 per species, as agreed with the World Bank or as per notification by the Government in the available open spaces around the buildings and other open spaces within the colony. However, the Eucalyptus species will be replaced with the local native tree species.
31. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?		No	As the existing species of trees at the site are not in the category of rare, threatened, or endangered species, therefore, no significant impact on any ecosystem will occur there.
ESS7: Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities			
32. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?		No	At the site and even in the entire central part of Khyber Pakhtunkhwa, there are no Indigenous Peoples or Communities as per ESS7 that are present.
ESS8: Cultural Heritage			
33. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?		No	There is no historical, archaeological, or culturally significant site or facility in the vicinity of the subproject site.
34. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves, or stones) or require excavation near there?		No	No objects have spiritual values to local communities present within or near the subproject site.
ESS10: Stakeholder Engagement and Information Disclosure			
35. Is Stakeholder Engagement Carried out, and what are the stakeholders' views about the subproject?	Yes		A summary of the stakeholder engagement is presented below: The site's central location, adjacent to Ghalanai Bazaar, was highlighted as a significant advantage, providing convenient access for the public. The proximity to the existing bazaar facilitates easier mobility for residents who rely on these government

		services, promoting social cohesion and inclusivity. The proposed site is accessible for all community members, including vulnerable groups such as women, children, elderly persons, and people with disabilities. This aspect was positively acknowledged by stakeholders. Stakeholders urged a thorough redesign and alignment of sanitation infrastructure to prevent environmental contamination, waterlogging, and associated public health risks, emphasizing the necessity of environmentally sound wastewater management. There was strong enthusiasm for implementing an additional tree plantation program focused on native species, which will further restore and improve the ecological balance and green cover around the complexes.
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3. Conclusion

From the above screening checklist, it is clear that the potential environmental and social risks and impacts of the subproject are of a moderate level and for a limited construction period. These risks and impacts can easily be handled, managed, and mitigated at the local level at the site with effective and efficient regular monitoring at the site. A site-specific ESMP will be prepared to mitigate these risks.

4. Review & Approval

 Reviewed By: Usman Shinwari Position: Deputy Director E&S C&W Date: 16/07/2025	 Approved By: Naveed Iqbal Position: Project Director, C&W PIU 16/07/2025
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Annex 3. Environmental Monitoring Checklist

Project Name: _____

Location: Ghalanai, District Mohmand, KP

Date of Monitoring: _____

Monitoring Team: _____

A. Air Quality and Dust Control

Parameter	Yes/No	Observations/Comments	Action Required
Dust suppression measures are in place (e.g., water sprinkling)			
Vehicles and machinery are well-maintained (no excessive smoke)			
Construction materials are properly covered during transport			
Ambient air quality monitored (PM10, PM2.5) if required			

B. Noise and Vibration

Parameter	Yes/No	Observations/Comments	Action Required
Noise levels within acceptable limits (dB)			
Use of silencers/mufflers on machinery and equipment			
Noise-sensitive receptors (schools, hospitals) identified and protected			

C. Soil and Erosion Control

Parameter	Yes/No	Observations/Comments	Action Required
Topsoil is stripped and stored properly			
Erosion control measures in place (e.g., silt fences, bunds)			
Excavation and filling carried out as per plan			

D. Water Resource Protection

Parameter	Yes/No	Observations/Comments	Action Required
No discharge of wastewater into water bodies			
Sanitation facilities for workers are provided			
Drinking water sources are protected from contamination			
Proper drainage and runoff management			

E. Waste Management

Parameter	Yes/No	Observations/Comments	Action Required
Solid waste is collected and disposed of properly			
Hazardous waste (oil, chemicals) is handled safely			
Reuse/recycling practices in place (if any)			

F. Biodiversity and Vegetation

Parameter	Yes/No	Observations/Comments	Action Required
Vegetation clearance minimized			
Replantation or landscaping measures planned/implemented			
No disturbance to local fauna/habitats			

G. Occupational Health & Safety

Parameter	Yes/No	Observations/Comments	Action Required
PPE provided and used by workers			
Safety signage is posted at the site			
Emergency response procedures are in place			
Medical screenings for laborers are conducted by the contractor every four months times			

H. Social Considerations

Parameter	Yes/No	Observations/Comments	Action Required
Community grievances mechanism in place			
Local community consulted			
No child labor or forced labor observed			

I. Labor Camp Management

Parameter	Yes/No	Observations/Comments	Action Required
The labor camp area is clean, and solid waste is properly managed			
Adequate safety and security measures in place (lighting, gates/locks, boundary, guards)			
Labor camp located at a safe distance from nearby communities			
Clean and adequate living accommodations provided (ventilation, space, bedding)			
Clean and adequate washroom and bathing facilities are available and functional			
Adequate and hygienic kitchen/cooking facilities available			
Clean and safe drinking water is provided			
Separate facilities for male and female workers (if applicable)			
Camp rules and grievance mechanism communicated to workers			

Signature of Monitor: _____ Date: _____

Annex 4. Grievance Redress Mechanism (GRM) Form

Date: _____

Grievance Number: _____

Complainant Information (optional if anonymity is preferred)

- Name (Complainant): _____
- Gender: ☐ Female ☐ Male ☐ Other / Prefer not to say
- Age (optional): _____
- Cell Phone (optional): _____
- District: _____
- Tehsil: _____

Grievance Location (District, Tehsil, or specific site):

Description of Grievance

(Please provide details of your grievance, including *who, what, where, and when*. If relevant, kindly mention if the issue particularly affects women, men, or any vulnerable group.)

Suggested Resolution

(Please describe what outcome or action you expect to resolve the grievance.)

Confidentiality and Safety Note

The complainant's identity and details will remain confidential unless they consent to disclosure. Special attention will be given to grievances involving women, youth, minorities, or vulnerable groups to ensure dignity, respect, and safety.

Signature / Thumb Impression of Complainant (optional): _____

Signature of Recording Officer: _____

Instructions for Recording Officer (in simple terms):

- Ensure privacy (talk in a safe, separate space).
- Treat the complainant with respect (use their preferred gender identity).
- Do not force anyone to give their name or details.
- Pay extra attention to women, minorities, and vulnerable groups.

- For harassment or sensitive cases → refer immediately to protection/gender focal person.

Annex 5. Incident Reporting Format (ESIRT) Form

Details of Incident (e.g., to a worker or visitor) and Treatment		
Date of incident		
Time of incident		
Nature of incident	☐ Near miss ☐ First aid ☐ Medical treatment/doctor	
Name of injured person		
Address		
Occupation		
Date of birth		
Telephone		
Employer		
Activity in which the person was engaged at the time of injury		
Exact site location where injury occurred		
Nature of injury—e.g. fracture, burn, sprain, foreign body in eye etc.		
Body location of injury		
Treatment given onsite and Name of Treating Person		
Referral for further treatment? ☐ Yes ☐ No	Name of doctor or hospital	Medical certificate received? ☐ Yes ☐ No
Injury management required? ☐ Yes ☐ No	Return date	

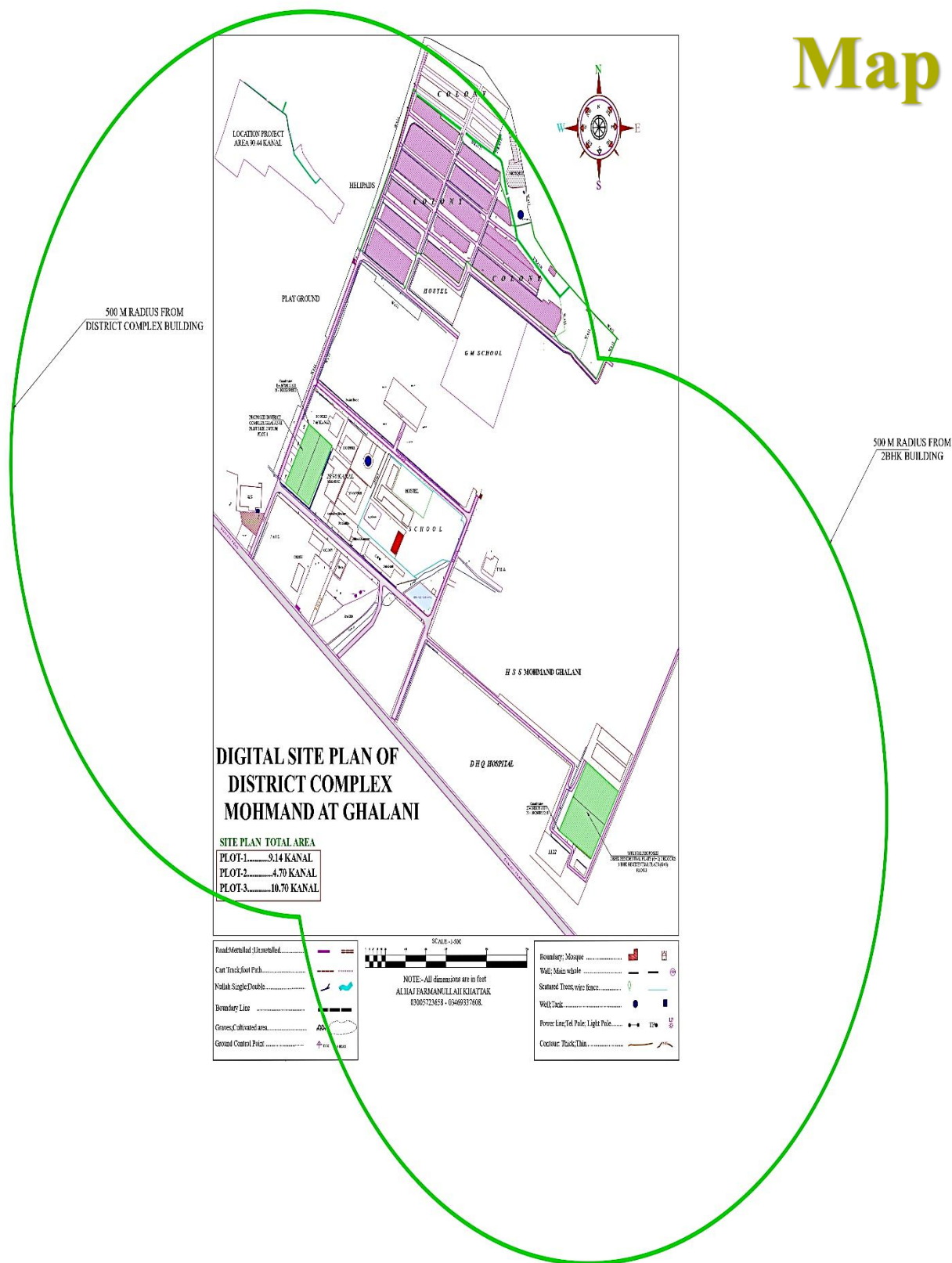
Witness to Incident (Include all witnesses)	
Witness name and contact	

Details of Incident	
Date of incident	
Time of incident	
Details of damage to equipment or property	
Name of person who received the report	
Description of incident	

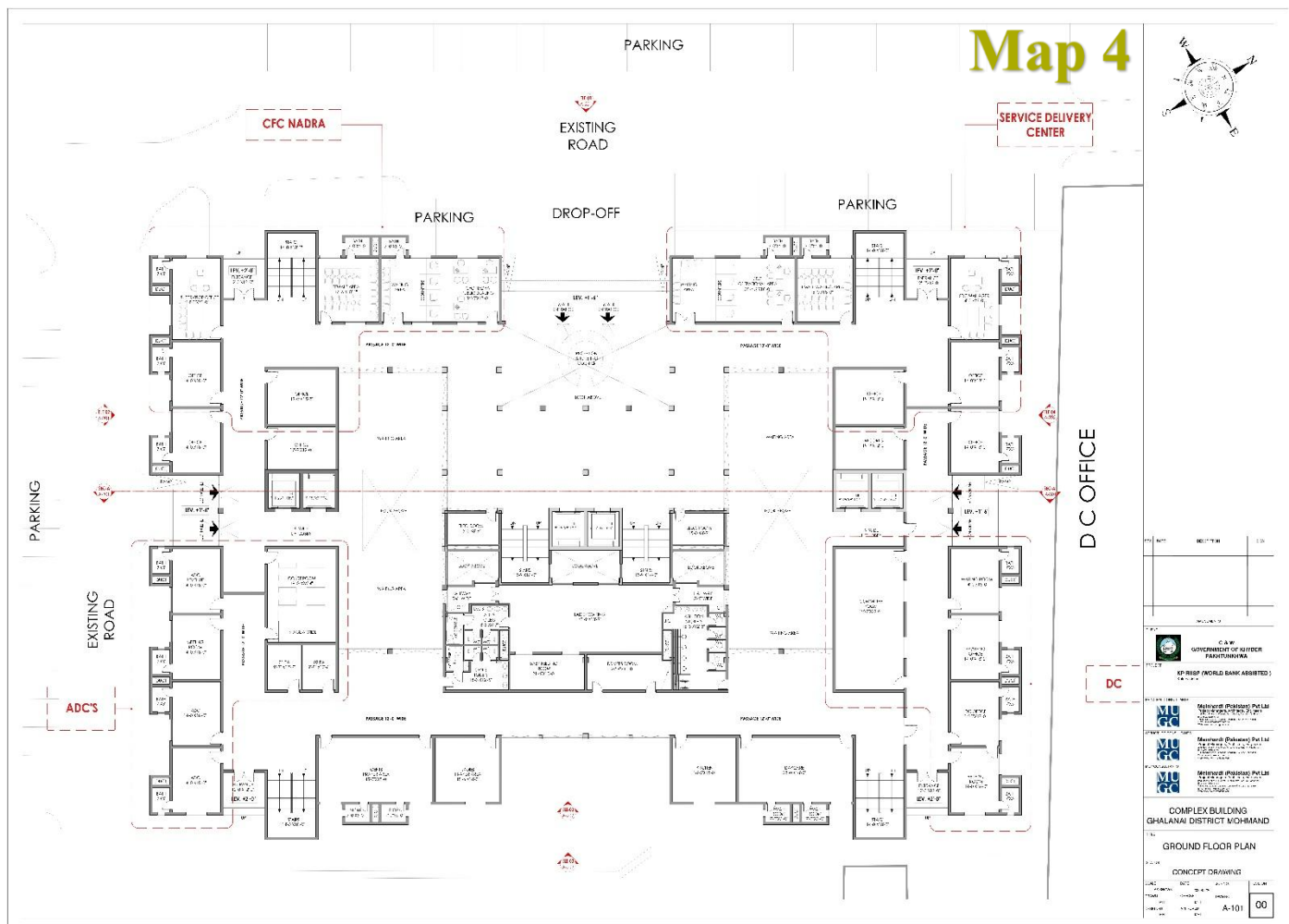
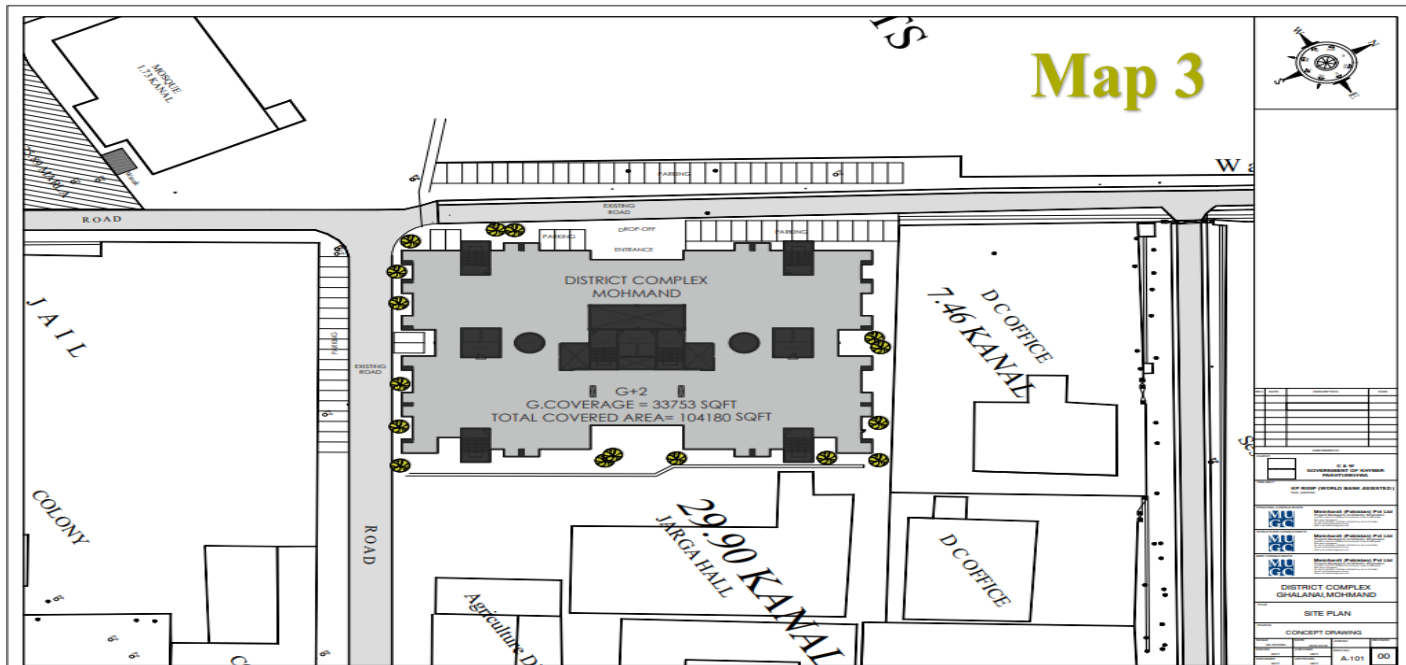
Annex 6. Maps and Architectural Diagrams



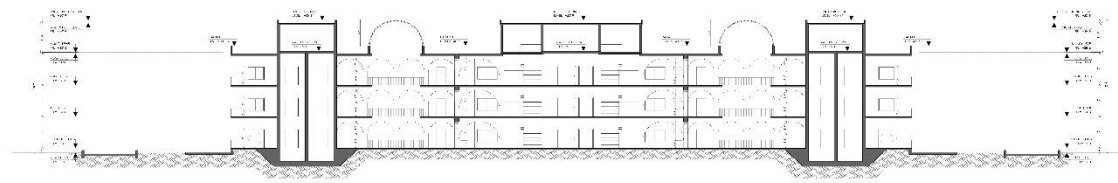
Map 2



i. **District Office Complex Building Ghalanai Architecture Conceptual Drawings**



Map 7



SECTION A-A

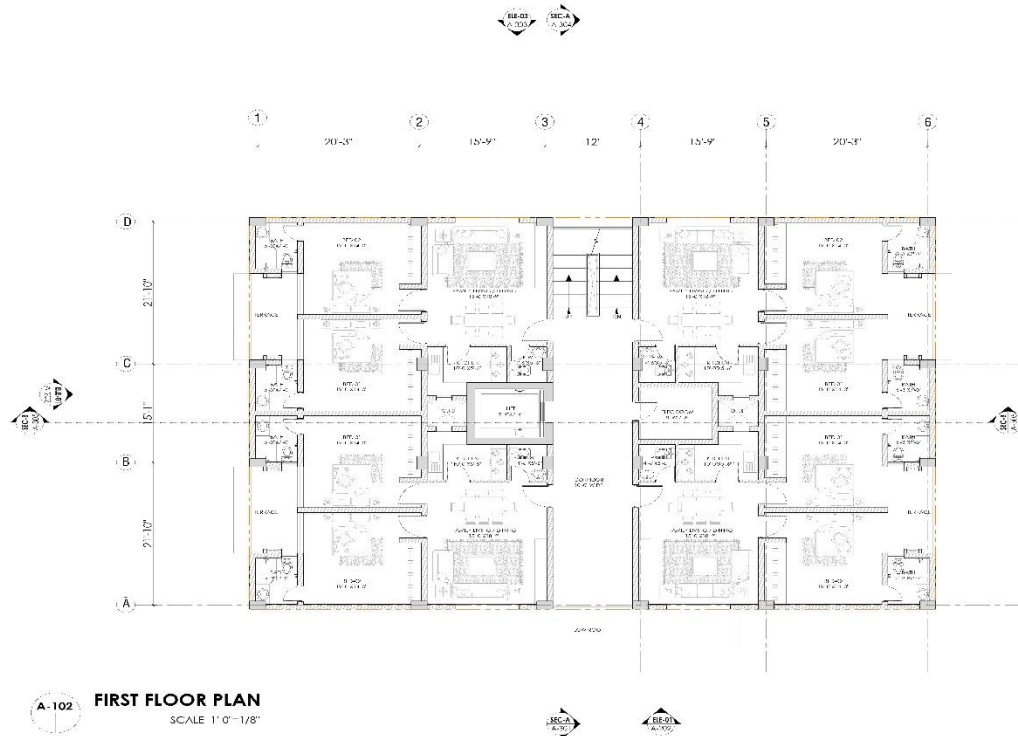
C.A.P. GOVERNMENT OF KHYBER PAKHTUNKHWA	
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Khyber Pakhtunkhwa P.W.D. Department	
Khyber Pakhtunkhwa P.W.D. Department	
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COMPLEX BUILDING	
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Map 8

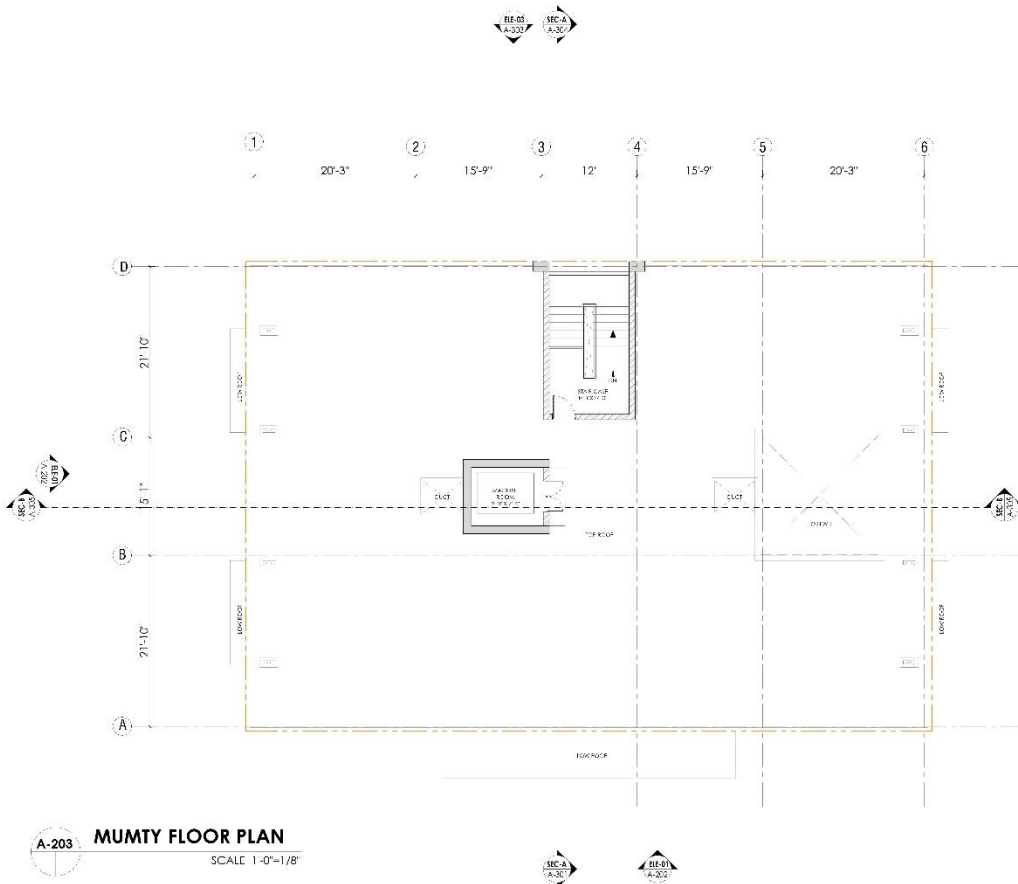


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Map 11

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Map 12

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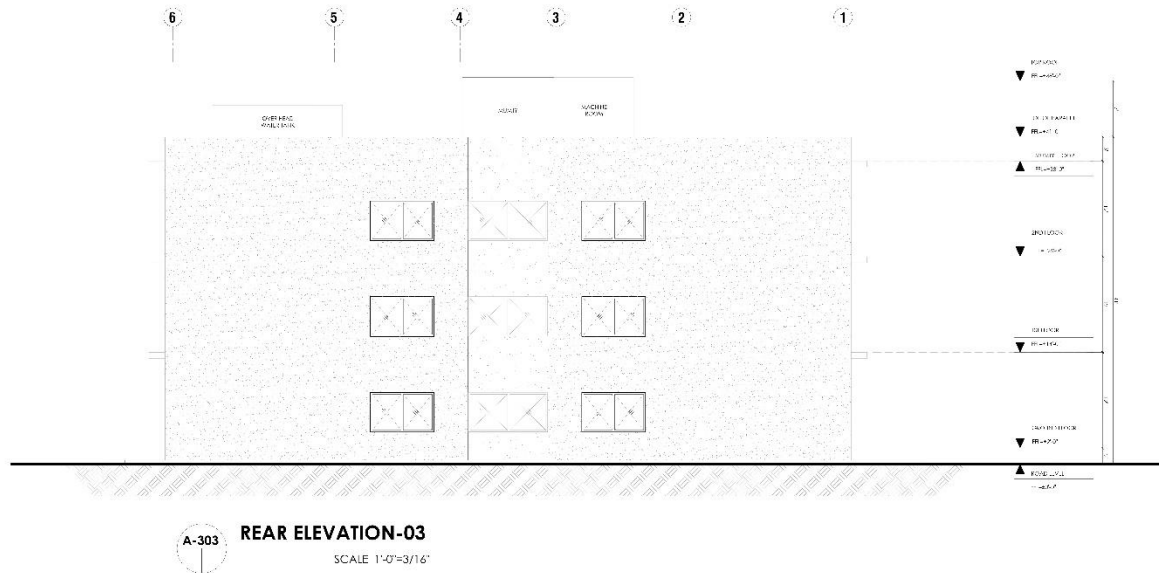
FRONT ELEVATION-01
SCALE 1"=0'=3/16"

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A-302 **RIGHTSIDE LEFTSIDE TYPICAL ELEVATION-02** **SCALE 1'-0"=3/16"**

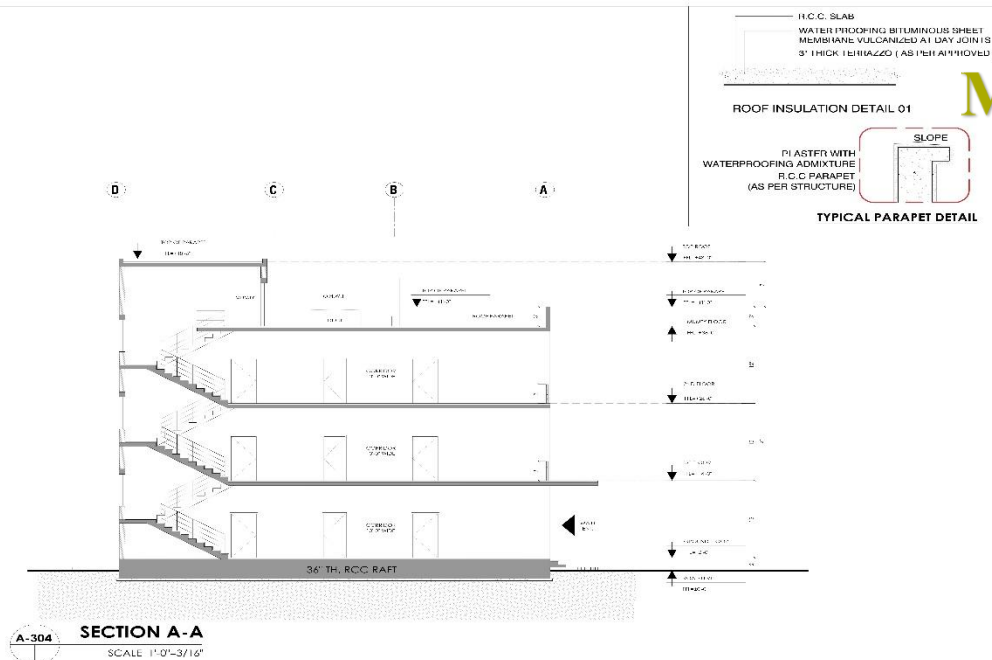
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Map 15



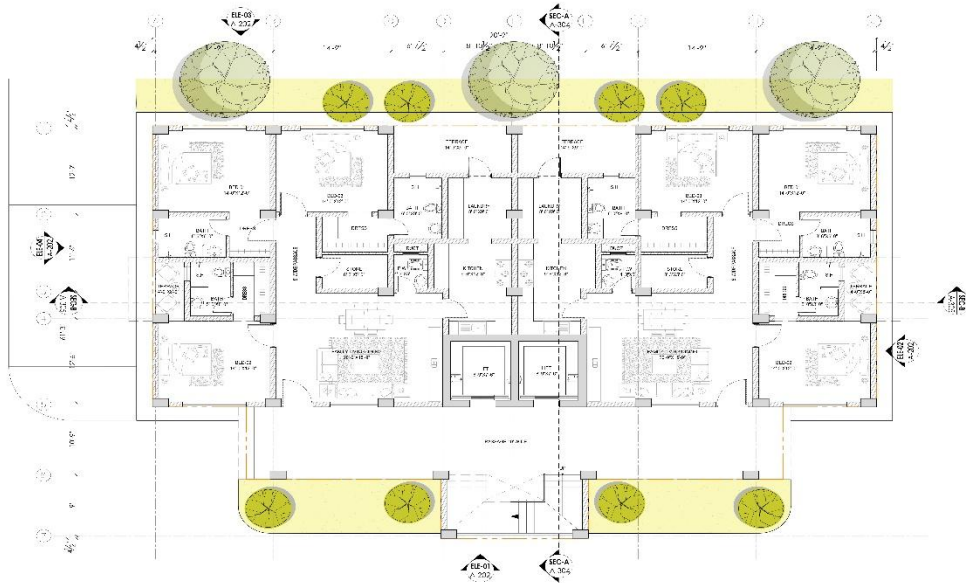
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Map 16



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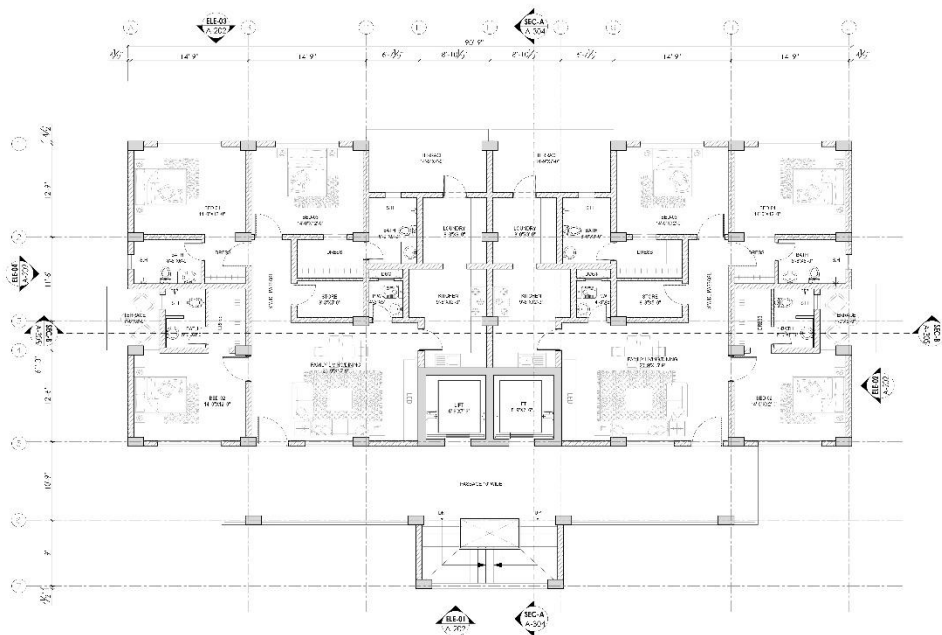
Map 19



GROUND FLOOR PLAN
SCALE: 1'-0"=3/16"

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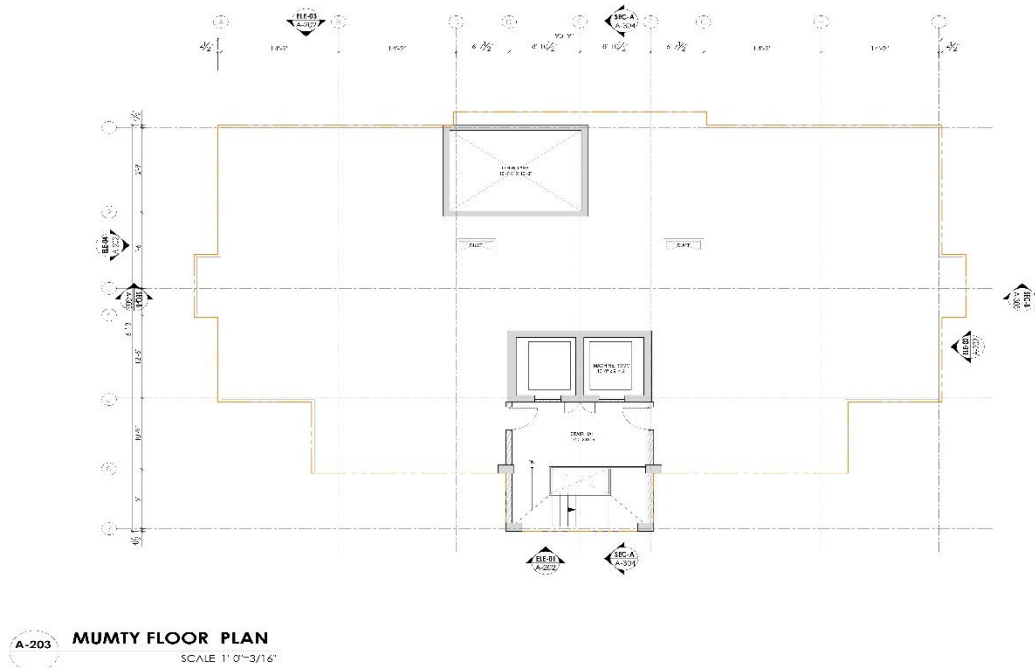
Map 20



1st FLOOR PLAN
SCALE 1'-0"=3/16"

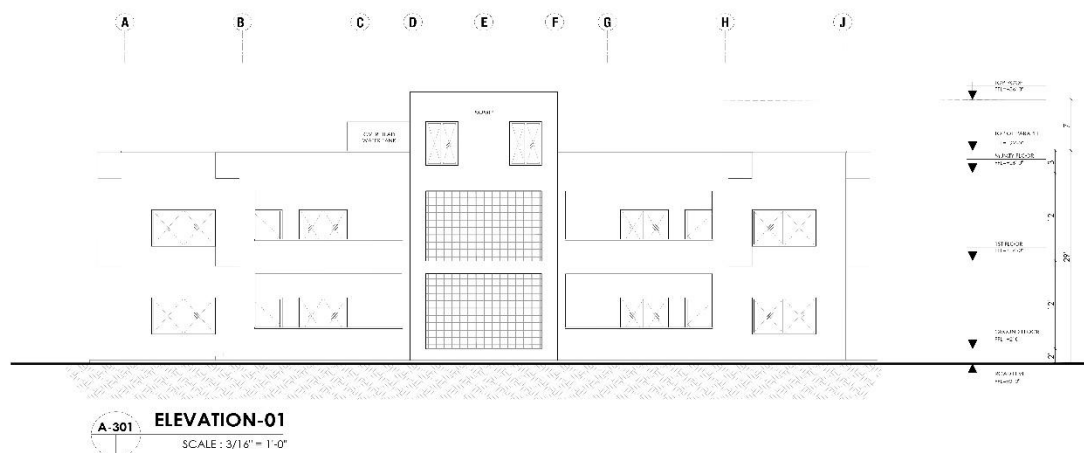
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Map 21



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OFFICE OF DEPARTMENT OF REVENUE REGISTRATION		
RE: REPT (WORLDWIDE BANK ADDRESS)		
	RECEIVED RECEIVED BY: [Signature] DATE: 2/28/2017	
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JOHN APARTMENT BUILDING GIALLANI DIST MOI BRAND		
MULTI-FLOOR PLAN		
CONCEPTUAL DRAWING		
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Map 22



REPUBLIC OF MYANMAR

GOVERNMENT OF MYANMAR
PROCLAMATION

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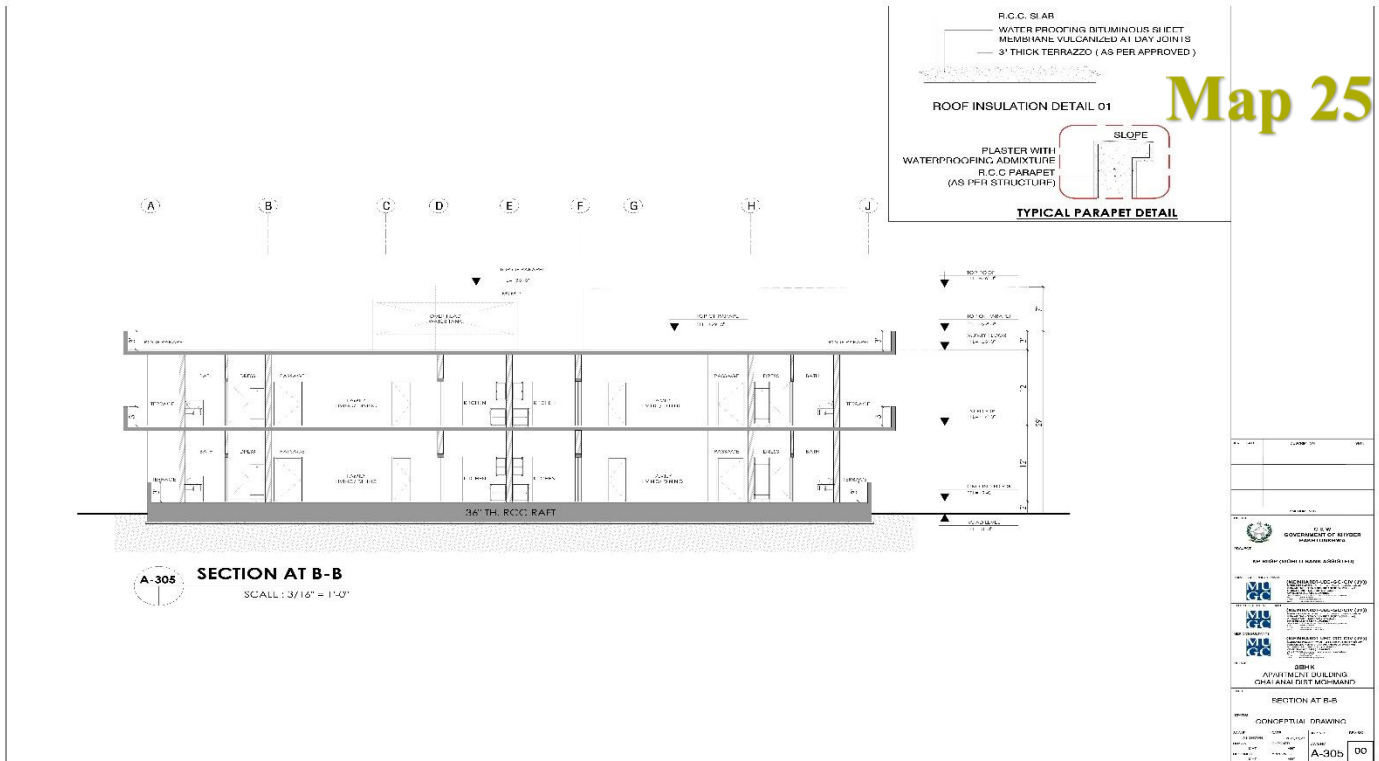
MINISTRY OF CONSTRUCTION
GENERAL SECRETARIAT

APARTMENT BUILDING
QI ALANAI DIST M01 MAND

ELEVATION - U1

CONCEPTUAL DRAWING

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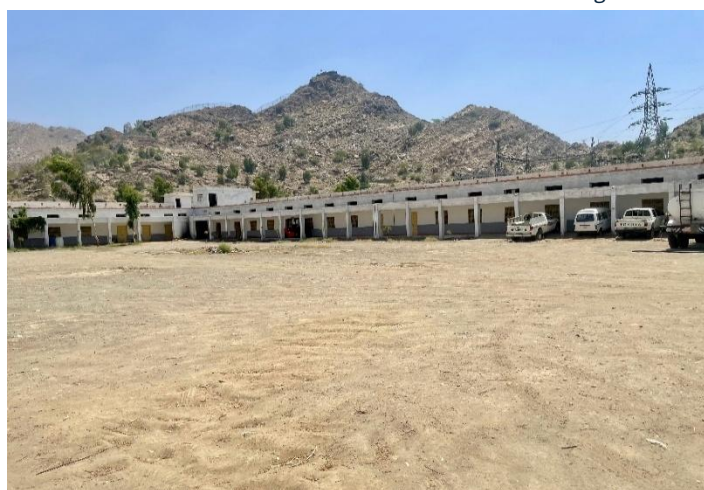
Annex 7. Photos (with captions) of the Site and of the Consultations



Stakeholder consultation at ADC office Ghalanai Mohmand. Representatives of line departments, community and district administration staff of District Ghalanai & Tehsil Ekka Ghund both attended the meeting & shared their feedback.



Meeting with the DC Ghallanai Mohmand at his office



Proposed site for Residential Complex.



Proposed site for the District Complex

Annex 8: Water Quality, Air, Noise, and Soil baseline test reports

Groundwater Testing — Results Matrix
NEQs, measured values for Points 1–6, observed ranges with units, and one-line remarks

Sr.	Category	Parameters	Unit	NEQs	Point 1	Point 2	Point 3	Point 4	Point 5	Point 6	Observed Range (6 pts)	Remarks
1	Bacterial	Total Coliform	-	Not seen at the 100ml sample	Not Seen	Not Seen	Not Seen	Not Seen	Not Seen	Not seen		Acceptable
2	Bacterial	Fecal Coliform	-	Not seen at the 100ml sample	Not Seen	Not Seen	Not Seen	Not Seen	Not Seen	Not seen		Acceptable
3	Physical	Color	TCU	≤ 15	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	No standard specified
4	Physical	Taste	-	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable
5	Physical	Odor	-	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable
6	Physical	Temperature	°C	-	24	28	24	25	25.5	24.5	24.0 to 28.0 °C	No standard specified
7	Physical	pH	-	6.5-8.5	7.1	7.18	7.45	7.8	7.4	7.8	7.10 to 7.80	Acceptable
8	Physical	Total Dissolved Solids	mg/L	< 1000	700	410	200	120	80	120	80.0 to 700.0 mg/L	Acceptable
9	Physical	Turbidity	NTU	< 5	2	3	1.5	2.2	2.5	3	1.5 to 3.0 NTU	Acceptable
10	Physical	Conductivity	mg/L	-	1400	820	400	240	160	240	160.0 to 1400.0 mg/L	No standard specified

11	Chemical	Total hardness	mg/L	< 500	76	80	50.5	30.5	140.5	150	30.5 to 150.0 mg/L	Acceptable
12	Chemical	Sodium	mg/L	-	10.6	10.6	20	20.3	1.2	25.5	1.2 to 25.5 mg/L	No standard specified
13	Chemical	Nitrite	mg/L	< 3 (P)	0.04	0.04	1	1.5	1.5	1.5	0.0 to 1.5 mg/L	Acceptable
14	Chemical	Calcium Hardness	mg/L	-	32	35	22.2	12.5	50.4	90.2	12.5 to 90.2 mg/L	No standard specified
15	Chemical	Magnesium Hardness	mg/L	-	44.15	44.15	28.5	17.5	90.3	50.2	17.5 to 90.3 mg/L	No standard specified
16	Chemical	Alkalinity	mg/L	-	2	2	30.5	45.6	20.4	50.5	2.0 to 50.5 mg/L	No standard specified
17	Chemical	Residual Chlorine	mg/L	0.2-0.5	0.1	0.12	0.01	0.01	0.03	0.02	0.0 to 0.1 mg/L	Low at some points
18	Chemical	Nitrate	mg/L	< 50	20	20	10	29.5	24.5	23.3	10.0 to 29.5 mg/L	Acceptable
19	Chemical	Potassium	mg/L	-	8.5	8.5	15.4	10.5	15.4	24.5	8.5 to 24.5 mg/L	No standard specified

Source: Master Plan Ghalanai, District Mohmand (August 2022)

Surface Water Testing — Results Matrix (Points 1–2)
APHA methods preserved as reported; remarks compare against listed NEQS.

Sr.	Parameters	Unit	Method	NEQS	Point 1	Point 2	Observed Range (2 pts)	Remarks
1	pH	-	APHA-4500H+B	6-10	7.71	7.71	7.71 to 7.71	Acceptable
2	Total Dissolved Solids (TDS)	mg/L	APHA-2540 C	3500	90.0	120.0	90.0 to 120.0 mg/L	Acceptable
3	Total Suspended Solids (TSS)	mg/L	APHA-2540 D	150	660.0	680.0	660.0 to 680.0 mg/L	High at some points
4	Sulfide	mg/L	APHA-4500S2-E	1.0	2.0	2.5	2.0 to 2.5 mg/L	High at some points
5	Chemical Oxygen Demand (COD)	mg/L	APHA-5220 C	150	290.0	250.0	250.0 to 290.0 mg/L	High at some points
6	Biochemical Oxygen Demand (BOD5)	mg/L	APHA-5220 D	80	142.5	122.5	122.5 to 142.5 mg/L	High at some points
7	Sulphate	mg/L	APHA-4600S2-E	600	200.0	10.2	10.2 to 200.0 mg/L	Acceptable

Source: Master Plan Ghalanai, District Mohmand (August 2022)

Ambient Air Quality — Results Matrix (Points 1–3)

Twenty-four-hour averages as reported.

Sr.	Parameters	Unit	Monitoring Duration	LDL	NEQS	Point 1	Point 2	Point 3	Observed Range (3 pts)	Remarks
1	Nitrogen Dioxide (NO ₂)	µg/m ³	24 Hours	1	80.0	25.12	23.72	26.17	23.7 to 26.2 µg/m ³	Acceptable
2	Nitrogen Oxide (NO)	µg/m ³	24 Hours	1	40.0	16.38	15.17	17.15	15.2 to 17.1 µg/m ³	Acceptable
3	NOX	µg/m ³	24 Hours	1	120.0	41.5	38.89	43.32	38.9 to 43.3 µg/m ³	Acceptable
4	Sulphur Dioxide (SO ₂)	µg/m ³	24 Hours	1	120.0	17.93	18.25	18.93	17.9 to 18.9 µg/m ³	Acceptable
5	Carbon Monoxide (CO)	mg/m ³	24 Hours	0.01	5.0	2.21	2.13	2.28	2.1 to 2.3 mg/m ³	Acceptable
6	Ozone (O ₃)	µg/m ³	24 Hours	-	130.0	15.12	14.61	15.91	14.6 to 15.9 µg/m ³	Acceptable
7	Particulate Matter (PM _{2.5})	µg/m ³	24 Hours	1	35.0	27.0	25.0	28.0	25.0 to 28.0 µg/m ³	Acceptable
8	Particulate Matter (PM ₁₀)	µg/m ³	24 Hours	1	150.0	121.0	119.0	117.0	117.0 to 121.0 µg/m ³	Acceptable
9	Suspended Particulate Matter (SPM)	µg/m ³	24 Hours	1	500.0	182.0	187.0	179.0	179.0 to 187.0 µg/m ³	Acceptable
10	Lead Airborne Particles	µg/m ³	24 Hours	-	1.5	0.022	0.02	0.017	0.017 to 0.022 µg/m ³	Acceptable

Source: Master Plan Ghalanai, District Mohmand (August 2022)

Noise Level Monitoring — Results Matrix (10 Points)
Commercial limits: 55 dB at night and 65 dB during the day.

Sr.	Parameter	Unit	NEQS (Commercial)	Point 1	Point 2	Point 3	Point 4	Point 5	Point 6	Point 7	Point 8	Point 9	Point 10	Observed Range (10 pts)	Remarks
1	LAavg — Night Time Average	dB	55	51	49	48	50	52	51	48	51	52	50	48.0 to 52.0 dB	Acceptable
2	LAavg — Day Time Average	dB	65	63	60	59	61	64	63	60	63	62	64	59.0 to 64.0 dB	Acceptable

Noise — Results Matrix (Points 1–3)
Commercial limits applied.

Sr.	Parameter	Unit	NEQS (Commercial)	Point 1	Point 2	Point 3	Observed Range (3 pts)	Remarks
1	LAavg — Night Time Average	dB	55	53	51	53	51.0 to 53.0 dB	Acceptable
2	LAavg — Day Time Average	dB	65	62	63	64	62.0 to 64.0 dB	Acceptable

Soil Quality — Results Matrix (Points 1–2)
Units and terms as provided in the source sheets.

Sr.	Parameters	Unit	NEQS	Point 1	Point 2	Observed Range (2 pts)	Remarks
1	pH	-	Not specified	8.5	7.8	7.8 to 8.5	No standard specified
2	Electric conductivity	mg/L	Not specified	340	140	140 to 340 mg/L	No standard specified
3	Particular matter	%	Not specified	2-3	2-3	2-3 %	No standard specified

Source: Master Plan Ghalanai, District Mohmand (August 2022)

Annex 9: Coordinates of the Proposed Site

DISTRICT COMPLEX GHALANAI, MOHMAND

Site	Area	Coordinates
District Complex Ghalanai, Mohmand	19.14 Kanal	E = 3678915.1611 N = 10028359.8811

RESIDENTIAL COMPLEX GHALANAI, MOHMAND

Site	Area	Coordinates
Residential Complex Ghalanai, Mohmand	10.70 Kanal	3680447.1996 10027133.4546
		3680623.5139 10027028.7167
		3680466.7900 10026782.7500
		3680293.8011 10026886.0288

Annex 10: Participants' list of Stakeholders' Consultation

Public Consultation Meeting

District/Tehsil:

Attendance sheet

Date:

S.No	Name	Designation/Department	Contact No.	Signature
1.	Syed Namdar Shah	A.D Industries/CDC	0332-9315898	
2.				
3.	Muhammad Tariq Khan	DPC Mohmand	0333 9147773	
4.	Imran Khan	D.O. Social Welfare	03459111339	
5.	Shahid Noor	DFD Porat	03455341640	
6.	Shakeel Khan	Inspr		
7.	SHAFAT-ULLAH	X-EN C3W H/way	030-9341556	
8.	SDO TESLO Chahallai			
9.	M. Mukram Ashraf	SDO TESLO Chahallai	0330-5059152	
10.	Fawad Talib	Inspector	03349510478	
11.	Sadiqullah	SDFO Forest	03340989802	

12.	Anwar-kehar	Agriculture	0343-9126482	
13.	Aisha Ali	DEO(F) office	03455554500	
14.	M. Irshad Kh	SLE/ADC Office	0300-5824046	
15.	Fazal Khalif	Naib Tehsil Dar Chahallai	0300-9095277	
16.	Fahsen ulah	Headr. A/c/Kn office	0331-9315978	
17.	Hanief Khan	Ultimate Eng consultant	03454512952	
18.	Saima Saeed	Meinhardt consultant / PDC3W	8343 9285250	

Annex 11. KPRIISP Code of Conduct (GBV/SEA/SH Mitigation Plan)**Code of Conduct (GBV and SEA/SH Prevention)****Khyber Pakhtunkhwa Rural Investment & Institutional Strengthening Project (KP-RIISP)****Responsible Authority:** KPRIISP E&S Unit | **Applicability:** All Staff, Consultants, Contractors**Definitions**

To ensure clarity and alignment, basic key terms are defined below:

GBV (Gender-Based Violence):

GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5).

SEA (Sexual Exploitation and Abuse):

Sexual Exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

Sexual Abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).

SH (Sexual Harassment):

Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. This may include unwelcome sexual advances, requests for sexual favors, and may take place through online activity or mobile communications as well as in person.

GRM (Grievance Redress Mechanism):

The KPRIISP has set up a GRM to respond to the concerned grievances in both community and workplace settings. Under the project's GRM there will be a dedicated GBV reporting mechanism ensuring confidentiality and survival centered approach. It will further ensure that every report is handled professionally, with the survivor's safety, dignity, and access to support services as top priorities.

1. General Responsibilities

All personnel must:

- Consent to a security background check.
- Treat all individuals (women, men, children, persons with disabilities, transgenders, etc.) with respect and dignity, free from discrimination.
- Comply with National & Provincial Laws, World Bank's Good Practice Note, GBV Risk Assessment Tool, and KPRIISP's GBV and SEA/SH Mitigation Plan.

Maintain a safe environment by:

- Ensuring workplaces are risk-free.
- Following emergency procedures (availability of first aid box, fire extinguishers, displaying of CoC in English, Urdu & local dialect and all mitigation measures must be in effect).
- Report concerns via KPRIISP's GRM or to the designated focal person.
- Attend mandatory annual GBV and SEA/SH training, with bi-annual refreshers for field teams.

2. GBV/SEA/SH and Child Protection

Prohibited Conduct:

- Inappropriate language/behavior, sexual advances, or transactional sex.
- Any sexual activity with children (consent or mistaken age is no defense).

Mitigation Measures:

- Report suspicions to the GBV Grievance Redress Committee/designated focal person.
- Ensure workplaces/communities are harassment-free as per the Khyber Pakhtunkhwa Protection Against Harassment of Women at Workplace (Amendment) Act, 2020.
- Collaborate with provincial/local authorities/NGOs to support survivors.

3. Contractor/Consultant Obligations

Contractors/consultant must:

- Implement CoC requirements in HR policies, site protocols, and grievance mechanisms.
- Ensure compliance is a condition of contract performance.

4. Accountability & Compliance

- Zero Tolerance: Violations lead to warnings, termination, or legal action.
- Confidentiality: Whistleblowers and survivors are protected.

Signature Section

By signing, I commit to upholding this Code:

Name: _____

Designation: _____

Organization: _____ (for contractors/consultants/staff)

CNIC: _____

Signature: _____

Date: _____

Reporting & Enforcement:

Focal Persons:

- PCMU: Senior Social Development Specialist/Gender Officer
- PIU: Senior Social Development Specialist/Gender Officer/ Established Arrangements

Process:

1. Report to focal persons via GRM (anonymous options available)/direct report to senior management.
2. Preliminary inquiry within 15 days.
3. Outcomes: Verbal/written warnings, disengagement, or legal referral.
4. Confidentiality: Survivor identities protected; retaliation prohibited.

Implementation Requirements

- Visual Display: Mount CoC in English, Urdu, and Pashto across offices.
- Onboarding: Include CoC in orientation kits for all personnel.

Approved by:

Project Director

Project Coordination and Management Unit (PCMU)

Khyber Pakhtunkhwa Rural Investment and Institutional Support Project (KP-RIISP)

Planning and Development Department, Khyber Pakhtunkhwa

Annexure 12: Labor Camp Management Details

1. Site Selection & Layout

- **Proposed Location:**
 - Based on the District Complex's site analysis, the labor camp will be located within the boundary of the Government Colony. A potential location will be the vacant portion of Plot No. 2 (Residential Complex site) or an adjacent designated open area. The final location of the camp be selected in consultation and approval with the District Administration.
 - **Reasoning:** This location is approximately 10.70 kanals in size, offering sufficient space (required: 1000-1500 sq. yards) while maintaining a safe distance from the DHQ Hospital (200m away) and schools (250-300m away) to minimize noise and disturbance.
- **Layout:**
 - The camp will be fenced and gated to restrict unauthorized entry by outsiders or animals.
 - It will be positioned to allow easy access to the construction site while ensuring privacy for the existing government official residences nearby.

2. Accommodation Standards

- **Capacity:** The camp will be designed to accommodate 20–25 laborers (anticipated workforce).
- **Structure:** Durable temporary structures (weather-proof tents or pre-fab containers) will be used to withstand the local climate (hot summers/cold winters).
- **Facilities:**
 - Adequate ventilation and lighting will be provided in all sleeping quarters.
 - Workers will be provided with bedding and secure storage for personal belongings.
 - ID Cards: All workers staying in the camp will be issued ID cards for security.

3. Water Supply & Sanitation

- **Water Supply:**
 - Safe drinking water will be continuously available. The water supply to the camp will be provided from the existing colony tube well network or supplied via water tankers if necessary.
- **Sanitation:**
 - **Toilets:** Pit latrines or flush toilets connected to septic tanks will be constructed on-site (approx. 1 unit per 6-8 workers).
 - **Wastewater:** Sealed washing basins and lined wash areas will be built. Wastewater will be directed to a septic tank/soakage pit to prevent mixing with surface water or open drains.

4. Waste Management

- **Solid Waste:**
 - A Waste Management Plan will be implemented. Color-coded bins will be placed for segregation.
- Waste will be collected daily and disposed of at existing designated municipal disposal site.
- **Prohibitions:** Open burning of solid waste at the campsite will be strictly banned.
- **Animal Safety:** Waste will be properly stored to prevent attracting wild animals common in the Ghalanai area.

5. Health & Safety

- **Medical Facilities:**
 - A First Aid Box with essential medicines will be available on-site 24/7.
 - **Emergency Access:** The DHQ Hospital Ghalanai is located 200 meters from the site for major medical emergencies.
- **Fire Safety:** Firefighting equipment (extinguishers, sand buckets) will be installed at the camp.
- **Disease Control:** Regular disinfection and "Anti-termite" spraying (if needed) will be conducted. Measures to prevent communicable diseases (e.g., Dengue, Malaria, COVID-19) will be enforced.

6. Food & Nutrition

- **Kitchen:** A hygienic cooking area/mess will be established separately from sleeping quarters.
- **Fuel:** The contractor must provide LPG cylinders for cooking. Cutting local trees/bushes (e.g., Acacia, Eucalyptus) for fuel is strictly prohibited.
- **Hygiene:** Kitchen waste will be disposed of daily to maintain hygiene and prevent pests.

7. Worker Welfare & Social Facilities

- **Social Connectivity:** Workers will have access to mobile communication (network coverage is available in Ghalanai).
- **Transport:** Vehicles will be available for emergency transport or material handling.
- **Mosque:** A prayer area will be designated within the camp or workers may use the existing prayer facilities in the complex.

8. Labor Rights & Compliance

- **Standards:** The camp will operate in compliance with ESS2 (Labor and Working Conditions) and ESS4 (Community Health and Safety).
- **Prohibitions:** Child labor and forced labor are strictly prohibited. Verification of CNICs will be mandatory upon hiring.
- **Code of Conduct (CoC):** All workers must sign a GBV/SEA/SH Code of Conduct (Annex 11) to ensure respectful interaction with the local community and prevention of harassment.

9. Grievance Redress Mechanism (GRM)

- **Internal GRM:** A complaint box/register will be maintained at the camp for workers to report issues (wages, facilities, harassment).
- **Focal Person:** The Contractor's Site Environmental Engineer will be the first point of contact for resolving grievances.
- **Escalation:** Unresolved issues can be escalated to the PIU C&W GRM Focal Person (Deputy Director E&S).

10. Monitoring & Reporting

- **Daily:** Contractor's Site Supervisor to inspect hygiene, safety, and waste disposal.
- **Weekly:** The Environmental Monitoring Checklist (Annex 3) will be used to formally audit camp conditions.
- **Reporting:** Monthly reports on camp status, worker health, and grievances will be submitted to the Supervision Consultant (SC) and PIU.

Annexure 13: Components of Site Specific OH&S Plan

1. Risk Assessment & Planning

- **Hazard Identification:**
 - Demolition Risks: Demolition of the existing structurally damaged building on Plot No. 3 (Residential Complex) and Plot No. 1 (District Complex) poses risks of falling debris, dust inhalation, and structural collapse.
 - Asbestos Exposure: The potential presence of asbestos in old building materials requires specific identification and handling protocols to prevent lung diseases.
 - Working at Height: Construction of G+2 buildings presents fall hazards for workers.
 - Excavation & Soil Stability: Excavation for foundations in the rocky/gravel terrain of Ghalanai may pose risks of cave-ins or dust clouds.
 - Climate Hazards: Extreme heat during June/July (mean max 40°C) increases the risk of heatstroke and dehydration for laborers.
 - Traffic Hazards: Movement of heavy machinery near the Ghalanai Bazaar (400m away) and internal colony roads poses collision risks.
- **Planning:**
 - Systematic top-down demolition will be adopted to ensure safety on Plots 1 & 3,
 - Asbestos Management: A licensed firm will be engaged if asbestos is found; a wetting agent will be applied during removal to suppress fibers.

2. Clear Roles & Responsibilities

- **Contractor's Site Environmental Engineer (CEE):**
 - Responsible for implementing this OH&S plan, conducting daily safety inspections, and ensuring workers wear PPE.
 - Must prepare sub-plans (Traffic Diversion, Site Rehabilitation) and submit them to the Supervision Consultant.
- **Site Supervisor:**
 - Ensures that only authorized workers enter the construction boundary and that visitors follow safety protocols.
- **Supervision Consultant's Environmental Engineer (EE):**
 - Oversees the Contractor's performance and issues instructions for corrective actions regarding safety violations.
- **PIU (C&W):**
 - Conducts spot checks and monitors compliance with the World Bank's Environmental and Social Standards (ESS2 & ESS4).

3. Training & Awareness

- **Induction Training:** All laborers will receive mandatory training on site safety, cultural norms, and the Code of Conduct (GBV/SEA/SH) before accessing the site.
- **Toolbox Talks:** Daily briefings will be conducted on specific daily hazards (e.g., "Working on Scaffolding," "Electrical Safety," "Handling Hazardous Materials").
- **Specialized Training:**
 - **Asbestos Awareness:** Training on identifying and safely handling asbestos-containing materials.

- **Heat Stress Management:** Educating workers on hydration and recognizing heatstroke symptoms during the hot Ghalanai summer.
- **First Aid & Fire Safety:** Designated staff will be trained in basic medical services and firefighting.

4. Safe Work Procedures

- **Permit-to-Work System:** Required for high-risk activities, specifically:
 - Demolition of the existing office building on Plot 3.
 - Hot work (welding/cutting) and electrical maintenance.
 - Excavation deeper than 1.5 meters.
- **Personal Protective Equipment (PPE):**
 - **Mandatory:** Safety helmets, high-visibility vests, and safety shoes for all workers.
 - **Task-Specific:**
 - Dust Masks: For excavation and demolition crews (preventing respiratory issues).
 - Ear Muffs/Plugs: For workers operating heavy machinery or drill rigs (noise abatement).
 - Safety Harnesses: For work on the upper floors of the G+2 building.
- **Machinery Maintenance:** Regular checks of cranes, pile rigs, and vehicles to prevent hydraulic leaks or mechanical failure.

5. Site Safety Controls

- **Barriers & Fencing:**
 - The construction sites (Plots 1, 2, & 3) must be fully fenced to separate them from the Government Colony residents and nearby sensitive receptors like the School (250m away) and DHQ Hospital (200m away).
 - Specific exclusion zones will be established around demolition areas.
- **Signage:** Safety signs (e.g., "Hard Hat Area," "Deep Excavation," "No Entry," "Emergency Exit") will be displayed in Urdu and Pashto at prominent locations.
- **Traffic Management:**
 - Construction vehicle movement will be restricted during school start/end times to protect students.
 - Speed limits will be enforced within the colony roads.
- **Dust Control:** Regular water sprinkling on excavation sites and unpaved roads to maintain air quality and visibility.

6. Monitoring & Reporting

- **Inspections:**
 - **Daily:** Site Supervisor to check PPE compliance, hygiene of toilets/kitchens, and machinery safety.
 - **Weekly:** Use the Environmental Monitoring Checklist (Annex 3) to audit comprehensive safety measures.
- **Incident Reporting:**
 - Any accident or "near-miss" must be recorded using the Incident Reporting Format (Annex 5) and reported to the PIU within 24–48 hours.
- **Audits:** Quarterly OH&S audits will be conducted by the Supervision Consultant.

7. Emergency Preparedness

- **Emergency Response Plan:** A specific plan will be developed for fire, structural collapse, and medical emergencies.
- **Medical Facilities:**
 - **On-Site:** Fully stocked First Aid Boxes (minimum 3 units) and trained first-aiders available at all times.
 - **Referral Hospital:** The DHQ Hospital Ghalanai is located approximately 200 meters from the site (Plot 2), allowing for rapid transport in case of serious injury.
- **Fire Safety:** Fire extinguishers and sand buckets will be strategically placed near fuel storage, kitchens, and electrical panels.
- **Communication:** Emergency contact numbers (Hospital, Fire Brigade, PIU Safety Officer) will be posted at the site office and labor camp.