

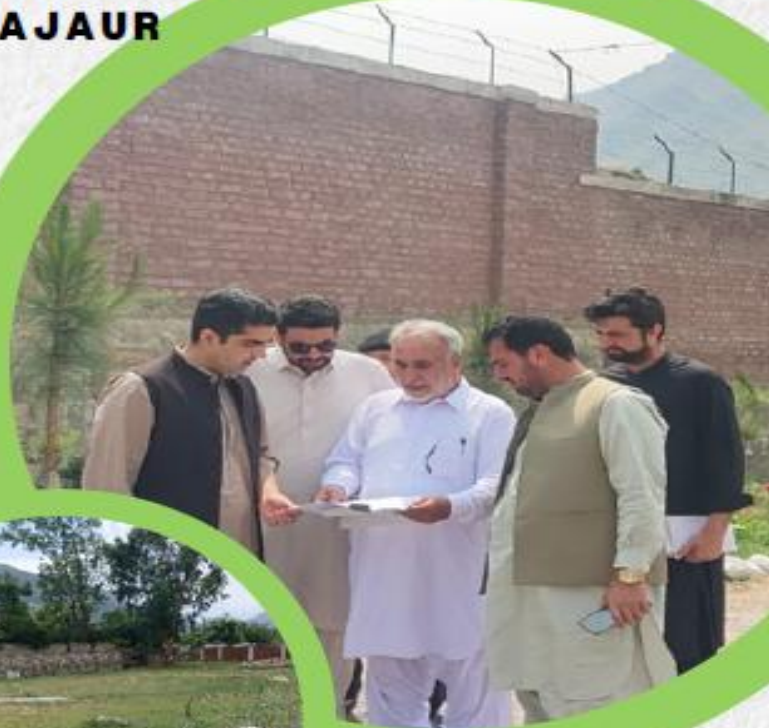
**MEINHARDT-UEC-GC-CIV (JV)**Consulting Services for Design, Procurement Support and Construction Supervision Consultants
Client: Communication and Works Department (C&WD) of Khyber Pakhtunkhwa**KHYBER PAKHTUNKHWA RURAL INVESTMENT
AND INSTITUTIONAL SUPPORT PROJECT****ENVIRONMENTAL AND SOCIAL
MANAGEMENT PLAN
FOR
TEHSIL OFFICES AND RESIDENCE
COMPLEX NAWAGAI, DISTRICT, BAJAUR***October 2025**PREPARED BY MEINHARDT
CONSULTANTS PIU – C&W**Prepared for the
Communication & Works
Department KP*

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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 Tehsil Complex Nawagai, District Bajaur, 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 proposed selected plots for the new buildings, one for the Tehsil complex building, having an area of 3.5 kanals, and another for the residential building, having an area of 1 kanal. The complex will house offices for the Tehsil Administration, Tehsil Municipal Administration, and line departments; residential units for government staff.

Nawagai, Bajaur has environmental and social challenges: some areas show good water quality, others face challenges with high turbidity, hardness, and microbial contamination. Presence of Particulate Matter (PM) and Nitrogen Dioxide (NO₂) is at a moderate level, resulting in a poor air quality state, causing health risks for the residents and climate extremes (droughts/floods), Low female literacy (12.29%), security concerns, and limited economic opportunities are also concerns.

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 8,1462,00/--**, 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 site for the proposed subproject is situated on the main Bajaur-Mohmand Road. The site is approximately 1 km from the main Nawagai Bazaar. The site coordinates and site pictures, showing the existing situation of the site, are placed at Annexure-9 with the ESMP. 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 Tehsil headquarters. The specific objectives are:

- i. To provide the office accommodation requirements for the Tehsil Administration, Tehsil Municipal Administration, and Line Departments with all required basic and allied facilities,
- 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 Tehsil 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

Two different plots are selected for the proposed Tehsil Complex, Nawagai. One for the Tehsil complex building, having an area of 3.5 kanals, and another for the residential building, having an area of 1 kanal. The architecture plans of the Tehsil complex is placed in Annexure 6. The proposed complex has the following components:

1. One block having a Basement, Ground + 3-storied Office building for accommodating the Tehsil Administration, and line department offices, Map 3 of Annexure 6 shows the Office building.
2. One block of 2-bed apartment buildings, G+2 story for Government Officials, Map -8 of Annexure 6 shows the residential building
3. Renovation of two Offices (Assistant Commissioner and Tehsildar Offices)

In addition to the proposed new construction of buildings for Offices and residential accommodation and renovation of two existing offices, the subproject involves the demolition of an existing Guest House building, which is occasionally used by visiting Government Officials, to make available the required space for the Office Building of the Tehsil Complex.

The subproject will also improve 1.1 km of internal roads within the existing compound. The improvement of existing roads consists of blacktopping of existing right of way and concreting the shoulders of these roads.

The land for the proposed subproject has been in the possession of the Government of KP for the last 50 years and so, and presently has a compound of Tehsil Administration offices and residences. Therefore, no land acquisition is required for the construction of the proposed District and Tehsil 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), a kitchen on each floor, service and circulation areas for easy access and circulation of the officials and the public, and car parking facilities for official visitors.

The residential building 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 2 of the Annexure 6 shows the land scape area of complex.

2.4 Area of Influence of the Subproject

The proposed Tehsil complex subproject site is located on the main Bajaur-Mohmand Road. The site is approximately 1 km from the main Nawagai Bazaar. The area of the influence of the proposed subproject site includes a mosque located around 30 meters across the proposed site for the residential building. A Nadra Office is located at a distance of 30-40 meters from the two houses to be renovated. A Tehsil Headquarter Hospital is situated around 300 meters from the proposed site of the Tehsil Office Complex. The area of influence also includes a police station and a Government Primary School at approximately 600 meters from the construction sites of the complex Map-2 in annexure 6 shows the area of influence of the complex.

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. The 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 within 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-KP Environment Assessment Rules 2021 is placed at Annexure 1.

4. ENVIRONMENTAL AND SOCIAL BASELINE

Nawagai is a major town in Nawagai Tehsil, an administrative subdivision of Bajaur District in Khyber Pakhtunkhwa Province. Nawagai is the fourth largest of Bajaur District's seven tehsils, covering an area of 216 km² and encompassing a valley and parallel ravine separated by a mountain range that extends from the border with Afghanistan.

4.1 Environmental Baseline

Nawagai Tehsil in Bajaur has a hilly, mountainous terrain with extreme temperatures, experiencing very cold winters and hot summers. The environment is characterized by a mix of cultivated land and forest area.

Biological Environment

The biological environment of Nawagai Tehsil in Bajaur is characterized by diverse flora adapted to its hilly, semi-arid climate, including mountain and riparian forests, with a mix of hilly and agricultural land. Plant life is influenced by the Hindu Kush mountain range, with dominant species often adapted to dry, temperate conditions. The climate of the area is characterized by extreme temperatures, especially during winter.

Flora and Fauna: The area features natural forests in the hills (e.g., Loe Mamund), forests along rivers, and agricultural lands. The dominant vegetation type is Sub-tropical Chir Pine and Sub-tropical Broad-Leaved forests. Local communities utilize a rich array of wild plants for traditional remedies, including herbs, shrubs, and trees. Common plant families include Lamiaceae, Rhamnaceae, Solanaceae, and Cucurbitaceae. At the subproject site, there are around 60 trees. The trees are of various kinds: Eucalyptus, chinaberry (*Melia azedarach*), and poplar (*Populus*). The area's fauna includes a rich variety of bird species, with the most common being the house sparrow, common myna, and red-vented bulbul. It also features other animals, such as wild boars and barking deer.

Physical Environment

Water resources in Nawagai Tehsil are primarily from both surface and groundwater, but quality is a significant issue. Air quality is a concern; however, the soil quality is generally fertile, especially in the plains of Nawagai, which is suitable for agriculture, although this can vary by location.

Topography: The topography of Nawagai in Bajaur District features a mix of hillocks, plains, and rivers, characterized by a valley and a parallel ravine separated by a mountain range extending to the Afghan border. The land includes fertile agricultural areas on plains and canal systems along rivers, as well as natural forests and hilly areas within the subdivision.

Climate: Nawagai has an extreme climate; the winter season typically begins in November and lasts until March. The winters are extremely chilled and cold and sometimes the temperature plunges below freezing point. December, January, and February are the coldest months. The mean maximum and minimum temperatures in these months are in the range of 5 to 16 degrees Celsius. The summer season lasts from May to October. June, July, and August are the hottest months. The mean maximum and minimum temperatures in this period are in the range of 23 to 36 degrees Celsius.

Soil Morphology: Medium-textured soils are found in the area. Water torrents erode the hilly soils, which deposit coarse material at the foot of the mountain's slope. Although there is a wide range of soil types, over 60 percent of the area ranges from moderately coarse to medium fine in soil texture. The soil of the area is clay loam, non-calcareous, non-saline, and non-sodic in nature. Soil pH is slightly alkaline. The soils are low in organic matter and nitrogen content, low in phosphorus, and medium in potassium content.

Water Resources: Water resources in the Nawagai Town area of Bajaur include springs and streams, with the Rud stream being the major one that flows through the valley. Other sources, like open wells, hand pumps, and tube wells,

are also used, but tube wells are recommended for drinking due to concerns about contamination from both natural and human activities. The underground water quality in Nawagai town varies; some areas show good water quality, while others face challenges with high turbidity, hardness, and microbial contamination. Turbidity, a measure of water clarity, is high (up to 45.633 NTU), indicating poor water quality. Total Hardness ranges from 580.67 mg/L, indicating varying levels of mineral content. pH values ranged from 7.49, indicating acidity or alkalinity levels. Microbial Contamination, some water samples exceed the permissible limit for coliforms (0.00MPN/100ml), suggesting potential fecal contamination. The underground water is available at 320 feet, and the water quality analysis is placed at Annex 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. In the Government Colony, Nawagai Town, there is no underground sewerage system, and all the existing buildings have septic tanks for the wastewater collection and disposal and the outflowing water from the septic tanks is going into a drain which takes it outside the colony into a seasonal nullah.. **Ambient Air Quality:** The Nawagai's air quality is a concern due to increasing vehicular traffic and the burning of solid waste. It is a health concern for unusually sensitive individuals. While most people can comfortably engage in outdoor activities, some pollutants might pose a slight risk to those particularly susceptible to air pollution. Some specific pollutants, such as PM 2.5 and PM 10 (Particulate matter less than 2.5 microns and 10 microns), are at higher levels, meaning inhalable particles can enter the lungs and have health risks for sensitive persons. NO 2 (Nitrogen Dioxide) is at a moderate level, resulting in a poor air quality state. Air quality analysis is placed in Annex 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.

Soil Quality: The soil of the area is clay loam, non-calcareous, non-saline, and non-sodic in nature. Soil pH is slightly alkaline. The soils are low in organic matter and nitrogen content, low in phosphorus, and medium in potassium content. The soil quality analysis is provided in Annexure 8. The soil data in annexure-8 are secondary sources, and the soil 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.

4.2 Social Baseline

Nawagai Tehsil in Bajaur District has a rich social baseline characterized by a strong tribal structure, predominantly Sunni Muslim population, who are commonly simple, hardworking, and devoted. Lungi is the culture of the tribesmen. Hujra and Tang Takor are one of the famous cultural norms. There are two major tribes, i.e., Tarkani and Utmankhel, in the Nawagai. These tribes are further divided into sub-tribes, sections and subsections.

Population: According to the 2023 census, Nawagai Tehsil has a population of 93,850 persons, with a male population of 47,662 persons, a female population of 46,184 persons, and transgender population of 4 persons, showing a sex ratio of 102.14 males per 100 females. The Nawagai Tehsil population is growing at a rate of 3 % annually. The average household size is 8.7 persons, indicating large units. The overall Nawagai Tehsil has an area of 216.0 km² with a population density of 434.5/km².

Literacy Rate: The average literacy rate in Nawagai is 26.26%, with 39.89% for males and 12.29% for females. A significant gender disparity exists. 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: In health sector, there are challenges of staff shortages, resource limitations, and infrastructure issues. Nawagai Hospital, situated in Nawagai town, serves as a critical healthcare facility for the local population.

Operated under a public-private partnership (PPP) model, the hospital aims to provide accessible and quality healthcare services to the community.

Economic and livelihood: Most of the people in Nawagai are linked to the profession of farming. Though there is no major business and the ratio of businessmen is very low, however, some people are engaged in the business of vehicle bargaining and property dealing.

Religious and Linguistic Diversity: The majority of Nawagai Tehsil residents belong to the Islamic faith, along with Ahmadi and Christians. The vast majority of Nawagai residents speak Pashto as their mother tongue, the predominant language of the ethnic Pashtuns in Khyber Pakhtunkhwa. While other residents record Urdu, Brahui, Sindi, Kashmiri, Punjabi, and Saraiki.

5. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

5.1 Public Consultation

In consultation, held on February 25, 2025, with the respective Tehsil Administration at the inception stage, the potential stakeholders for the subprojects were identified, 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 of the process, and later, with their advice, hold a broad-level consultation for the subproject. This approach has been adopted in view of the prevailing vulnerable security environment and has worked well for the C&W component of KPRIIP . A consultation session was conducted on May 10, 2025, in the Tehsil Administration Office, Nawagai, District Bajaur, 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.. 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.

- The Participants were satisfied that the selected site is ideal for establishing the Tehsil Complex due to its central location, state ownership, and accessibility from Nawagai Bazaar. They were also of the view that the site offers a strategic opportunity to consolidate scattered government offices, thereby improving service delivery and administrative efficiency.
- The site is inside Government premises; therefore, it is a safe place for the women, their accompanied children, and elderly people who are visiting the Government Offices for their required official work.
- The participant informed that there are no reports of gender-based violence (GBV) in the area; therefore, they considered the area very safe.

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.	Stakeholders highlighted the necessity for integrated office space, proper sanitation, and sufficient water supply infrastructure. While a tube well exists on site, a supplementary borehole will be required to meet increased demand.	The proposed building and associated facilities design have incorporated the suggested improvements in the new complex. The cost of the recommended facilities is included in the PC I document of the subproject.
2.	Participants suggested additional tree plantations focused on native species and greening the area with some landscaping.	Landscaping and plantation will be done at the time of the finishing stage of construction of the complex. The cost of additional planting and landscaping is included under the “External Development Head” of PCI of the subproject..
3.	The stakeholders informed that the site is not flood-prone, but the existing drainage system requires improvement. There is currently no proper sewage disposal system for the safe disposal of sewage water, and it will require the construction of septic tanks.	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 incorporated the provision of ramps, handrails, gender-segregated facilities, well-lighted spaces, and shaded waiting areas for the comfort and safety for visitors

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.	Assistant Commissioner Nawagai, District Bajaur.	Concerned about potential impacts like noise, dust, water access, and disturbance to routine activities from construction. Benefit from improved Office accommodation and facilities.
2.	Tehsildar Nawagai, District Bajaur.	Concerned about potential impacts like noise, dust, water access, and disturbance to routine activities from construction. Benefit from improved Office accommodation and facilities.
3.	Sub-Inspector Nawagai, Bajaur, KP	Concerned about potential impacts like noise, dust, water access, and disturbance in routine activities due to construction.
4.	Staff of NADRA Office, Nawagai Bajaur.	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
5.	Staff of Tehsil Headquarters Hospital, Nawagai Bajaur.	Concerned about potential impacts like noise, dust, water access, and disturbance in routine activities due to construction.
6.	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.
7.	Vulnerable and Marginalized Groups (Families living in servant quarters of existing houses)	Women, the elderly, and persons with disabilities may not get specific attention to ensure inclusive participation and to avoid exclusion or disproportionate negative impacts.
8.	Colony's School Teachers	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
9.	Colony's School Students	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
10.	Health Facility Staff	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
11.	Visiting and outdoor patients of the Hospital	Concerned about potential impacts such as noise, dust, and disturbance in routine activities due to construction.
12.	Owner and staff of canteens near the Passport Office and Hospital.	Concerned about disturbance in routine activities due to construction.
Secondary Stakeholders		
13.	Local Religious Leaders (Imams, Pesh Imams)	Hold moral authority and can influence public perception of the project.
14.	Local Administrative Authorities (Tehsil and District Level)	Involved in need assessments, land coordination, law and order, and service delivery.

15.	Environmental Protection Agency, Khyber Pakhtunkhwa (EPA-KP)	Regulatory authority responsible for ensuring environmental compliance and reviewing ESMP documentation.
16.	Contractor (s) and Construction Workers	Involved in implementation; requires clear orientation on social and environmental safeguards.
17.	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 outlines how stakeholders will be involved and informed during the **construction phase** of the project under the ESMP in Nawagai, Bajaur. 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, and 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 proposed 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 implementing mitigating measures, as well as environmental management and monitoring during the design, 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 minimised 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 the post-construction phase, during which the built complexes are handed over to the respective administrations. 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 the impacts, targets, mitigations, and responsible authorities for implementing mitigation measures during the 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 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.	Completed	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 made 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.	Completed	PIU, C&W
4	Seismic Hazard	To minimize the structural damage.	The proposed building and structures will be designed and	Completed	PIU, C&W

			constructed to withstand low to moderate earthquakes.		
5	Traffic Management	To minimize traffic problems in the subproject 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; and - Plan the timing for the movement of vehicles carrying construction materials to reduce traffic load and avoid inconvenience to the residents.	To be prepared.	Contract or to provide a 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.	Contract or to provide a 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 does not to burnt on site; and	To be prepared.	PIU, C&W

			The contractor will devise plan(s) for safe handling, storage, and disposal of harmful waste and materials.		
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; - Employ strict implementation of operation procedures; and - Providing the construction workers with suitable hearing protection, like ear caps or earmuffs, and training them in their use.	To be carried out.	Contract or Environmental Engineer (CEE)
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;	To be carried out.	CEE, and Supervision Consultant (SC) to monitor.

			- 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.		
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; 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;	To be carried out.	, CEE, and Supervision Consultant (SC) to monitor

			- 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 Regulatory Compliance under the NEQs.	- Protection of surface and groundwater reserves from any contamination sources, such as construction and oily wastes that could degrade their potable quality; - 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, below;	To be carried out.	CEE, and Supervision Consultant (SC) to monitor.

			▪ The 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 wastewater from machinery and vehicle washing to mix with surface waters; instead, sealed washing basins shall be used and all the wastewater shall be directed to a sedimentation or retention pond ; ▪ ; and ▪ . ▪ During all road improvement activities, the contractor shall implement effective controls to prevent construction debris and other waste from entering 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 ; ▪ 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 solid 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. It will be safely disposed of in an EPA-	To be done	CEE, and Supervision Consultant (SC) to monitor.

			registered hazardous waste facility within the province, etc; ▪ The solid waste will be disposed of in designated landfill sites to protect the underground water from contamination; ▪ Training of 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 ; ▪ 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. ; ▪ Locating the 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	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;	To be done.	PIU, CEE, SC

	are known risks.		- 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 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 with 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	- Obligatory insurance against accidents for laborers/workers shall be ensured; - Basic medical training shall be provided to specified workers, and 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	To be done.	CEE, and Supervision Consultant (SC) to monitor.

		hazards, exposure to hazardous materials and biological agents, and risks associated with unstable foundations.	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; ▪ 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		
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			devices, physical barriers, and warning tape, as well as deploying trained flag personnel to ensure safe 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 construction zone and road improvement spots ;		
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			▪ 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 disease (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; and ▪ 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); ▪ 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		
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			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 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.		
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;	To be Established.	Contractor, PIU

			- 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.		
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; - It is estimated that 5 to 10 eucalyptus trees will need to be removed to clear space for the Tehsil Complex building. Each tree will be replaced with 10 trees of the local species in the available land. The cost of the additional plantation is covered in PC I of the subproject under "External Development" head. ; - 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;	To be looked, once the construction activities are completed.	CEE, and Supervision Consultant (SC), and PIU to monitor.

			- 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 by the contractor at the time of starting the construction in accordance to the on-ground site conditions, submit it to the PIU C&W for approval and later for monitoring purposes 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 traffic movement during the construction stage.	To be prepared before the construction begins.	Contract or Traffic Engineer, SC, and PIU
11	Communicable diseases	To minimize the spread of Communicable diseases	A communicable disease prevention program will be prepared by the contractor for construction workers and the nearby residents at 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;	To be prepared before the construction begins.	Contract or H&S person.

			- 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.		
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 normal conditions of earthquake impacts; - Inspections should be conducted at three-month or six-month intervals by qualified personnel to ensure the integrity of structures; and - Develop an emergency response plan for the rainwater flooding in the sup project site.	To be carried out on completion of construction.	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	To be prepared.	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.	To be carried out.	PIU
4	Flora	To maintain flora in the Tehsil complex	- Routine monthly inspection will be carried out to check the maintenance of the Tehsil complex; - Weeds will be monitored weekly and removed no less than every two weeks;	To be carried out.	PIU

			- 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.		
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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 determine whether the EMP and its implementation are effective in mitigating impacts.

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
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	Visual inspections	Constructi on site	Once Daily	Contractor's Environmental Engineer (CEE), SC

		accidents taking place				
Soil Contamination	To prevent contamination of soil from oil and toxic chemical spills and leakages	Incidents of oil and toxic chemical spills	Visual inspections	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 Tehsil 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	Tehsil Complex premises	Bi-Annual	PIU, Tehsil Administration

6.2 Relocation of Employees

In the proposed subproject, the area identified for the Tehsil Office buildings has an existing Guest house building used for the stay of official visitors who come to Nawagai for Official visits. The proposed new construction of the Tehsil Administration's Offices will require the demolition of this building; however, the demolition will not involve the displacement of any permanent employees nor their livelihood disturbance, as the building is used occasionally by visiting official guests and therefore will not require a resettlement plan. It will be ensured that no guest is residing 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.

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 are critical to the successful implementation of the ESMP, 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 below in Table 8.

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.	One session for the Surrounding community.	1 Day

6.5 Institutional Arrangements and Roles

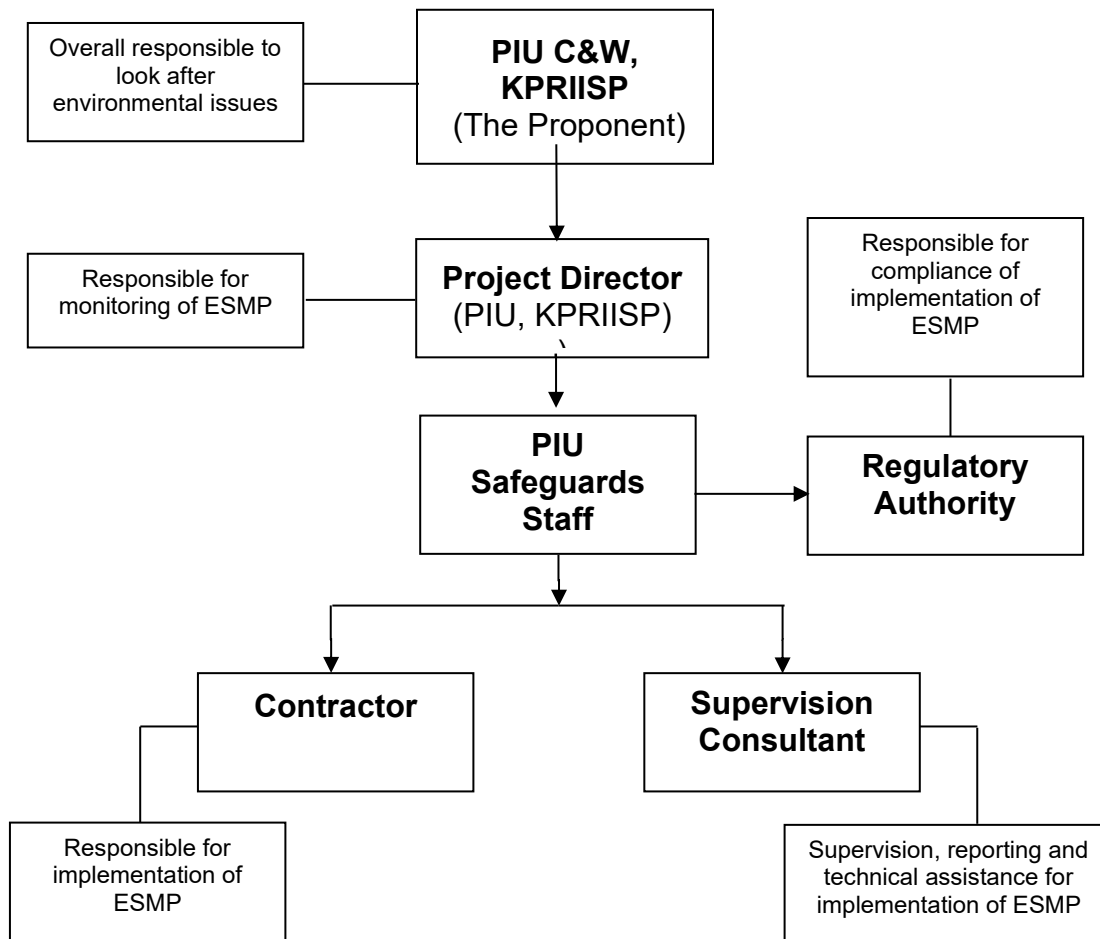
The main purpose of the ESMP is to provide a strategy for environmental protection. According to ESMP, all the activities associated with the project will be controlled and monitored during the design, construction, and operation phases. EMP will propose a plan of action that will indicate responsibilities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

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

- Program 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 respective ESMP to make sure all the recommended protective and safety measures are implemented in its later and sprit.

The ESMP will be part of the Bidding documents. On mobilization of the contractor for the subproject , 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 and Tehsil Administration, PIU C&W at a suitable location 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	3 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	673,500
Cost of environmental training	Lump sum	550,000
Disease Management Cost	Lump sum	400,000
Grand Total		4,598,500

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

Items	Quantity	Cost / Item (Rs.)	Total Cost (Rs.)
Dust masks	2200	20	44,000
Safety Shoes	95	2000	190,000
Gloves	1100	300	330,000
Safety Helmet	75	900	67,500
First Aid Box	3	8000	24,000
Ear Plugs	600	30	18,000
Total			673,500
Time required for Construction = 36 months			
Number of laborers required during construction = 15			
Dust mask	1 dust mask to be used in 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 an I laborer for 12 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	4,598,500/-
5.	Cost Estimate and Breakdown of PPEs	673,500
6.	Cost Estimate for Environmental Engineer, with intermittent input of 9-man-months @ PKR 150,000/ per month.	1,350,000/-
	Total	8,1462,00/-

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, 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 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's 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 Water balance Solid waste disposal Liquid waste treatment	<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 (Envnt)/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)

Annex 2. Environmental and Social Screening Form

Khyber Pakhtunkhwa Rural Investment and Institutional

Support Project

Environmental and Social Screening Checklist

For

Tehsil & Residential Complex Nawagai, District Bajaur

July 2025

This Checklist accompanies the annexes, including the Screening Form, the land coordinates of the complex site, the location map of the complex site, and pictures of the site.

The list of annexes contains the following:

1. Screening Form
2. Location Map of the Tehsil & Residential Complex site
3. Land Coordinates of the Tehsil & Residential Complex site
4. Master Plan of proposed Tehsil & Residential Complex site
5. Stakeholder Consultation Report

Annex 1. Screening Form

Subproject: Tehsil Complex, Nawagai, District Bajaur
 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: July 18, 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	Tehsil Complex Nawagai, District Bajaur
Subproject Location	The proposed new Tehsil complex in Nawagai, Bajaur District, is situated within the existing Government Colony in Tehsil Nawagai, on the main Bajaur-Mohmand Road. The site is approximately 1 km from the main Nawagai Bazaar. The respective Tehsil Administration has owned the Government Colony site in Tehsil Nawagai for approximately 51 years.
PIU in Charge	Communications & Works (C&W).
Estimated Cost	Not known at this time. It will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new Tehsil Complex includes the Tehsil Administration Offices, line departments' offices, and Residential accommodation for the respective Tehsil Officers and staff. Two different plots are selected, one for the Tehsil complex building, having an area of 3.5 kanals, and another one for the residential building, having an area of 1 kanal. The new Tehsil Complex comprises the Tehsil Administration, Tehsil Municipal Administration, and Line Departments' Offices. The Tehsil Administration building is a multistoried, ground+2-storied building. The multistory building provides Offices with allied facilities for the Tehsil Administration staff and visiting general public. The proposed new buildings 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 a residential building, Ground + 2 storied for Tehsil Administration staff. In addition, around the multistoried building block and along the access road, green areas with plantations will be developed to increase the green cover and aesthetics of the proposed complex.

2. Environmental and Social Screening Questionnaires

Questions	Answer		Remarks
	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 centres, schools, bridges and jetties?	Yes	The proposed subproject involves the new construction of office building and residential facilities for the Tehsil Administration and line departments of Nawagai, District Bajaur. Also, involves the demolition of the existing Guest house building to make available the required space for the new proposed Tehsil Office 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 borrows that exist within a radius of 2 to 3 km of 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 the use 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. Identity Cards of laborers will be checked during regular supervision visits. The National Identity Cards will be ensured with the labor at the time of hiring and kept as a 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 an available depression site around 1 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.		No	On the subproject site for construction activities, the water requirement will be met through any available surface water source in the near vicinity. Approximately 2 km from the site, Nawagai Khwar is flowing, and it can be used as a water source. 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 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 having Asbestos mixed 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 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, chance exists 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. In the pre-construction stage, an awareness campaign regarding the potential risks and the proposed measures and complaint registration provisions in the proposed GRM to report such unwanted situations will be done with the residents for their understanding, and to avoid such risks.

			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	One of the selected sites has existing building, and they have septic tank arrangements for 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 10-15 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 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 well-being 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 some public facilities in the Government Colony area, there is a mosque across the proposed site for the residential building and it lies around 15 meters from the proposed residence building site. There is a Tehsil Headquarter Hospital and is situated at around 300 meters from the proposed site for the Tehsil Office complex building.
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 has been in a declared Government Colony for approximately the last 51 years and is in use by the Government Officials of Tehsil Nawagai. 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 respective 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	One of the site of the subproject has existing Gust House building; the construction of new facilities will require the demolition of this

			building and it is lying vacant and it is not in use by any official. The other site for the residential building is on a vacant plot. Therefore, there will be no physical displacement of people in this subproject site.
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	Since all the people living there are Government employees, the temporary or permanent physical displacement will not affect the 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 51 years and has established the official Government Colony compound for the Tehsil-level Government staff 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 subproject 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 the office buildings and residential facilities within a defined area.
30. Will this activity require the clearance of trees, including inland natural vegetation?		No	There are approximately 50–60 trees present on the site. The trees are of various kinds: Eucalyptus, chinaberry (Melia azedarach), and poplar (Populus). The placement of buildings within the selected plots will be done keeping in view the existing trees' location at the site. 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

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)."

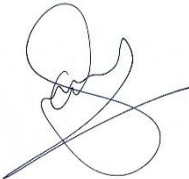
³ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

			the proposed new buildings is plotted on the ground before the execution of the foundations. The kind and number of trees to be cut down will be replaced with 7 or 10 per species, as agreed to 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 ESS7s 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?			A summary of the stakeholders' consultation is presented below: Participants viewed the selected site as ideal for establishing the Tehsil Complex due to its central location, state ownership, accessibility from Nawagai Bazaar, and Bajaur-Mohmand Road. The site also offers a strategic opportunity to consolidate scattered government offices, thereby improving service delivery and administrative efficiency. The site is accessible to women, children, persons with disabilities, and the elderly. Paved paths, adequate lighting, and public transport access are available. There is a pressing need for a purpose-built complex, as current facilities are inadequate and scattered. Stakeholders emphasized the need for integrated office space, proper sanitation, a sufficient water supply, improvements to the existing drainage system, and a proper solid waste collection and disposal system.

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: 29/07/2025	 Approved By: Naveed Iqbal Position: Project Director, C&W PIU 29/07/2025
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Annex 3. Sample Monitoring Checklist

Project Name: _____

Location: Nawagai, District Bajaur, 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
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 available and functional			
Adequate and hygienic kitchen/cooking facilities available			
Clean and safe drinking water 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

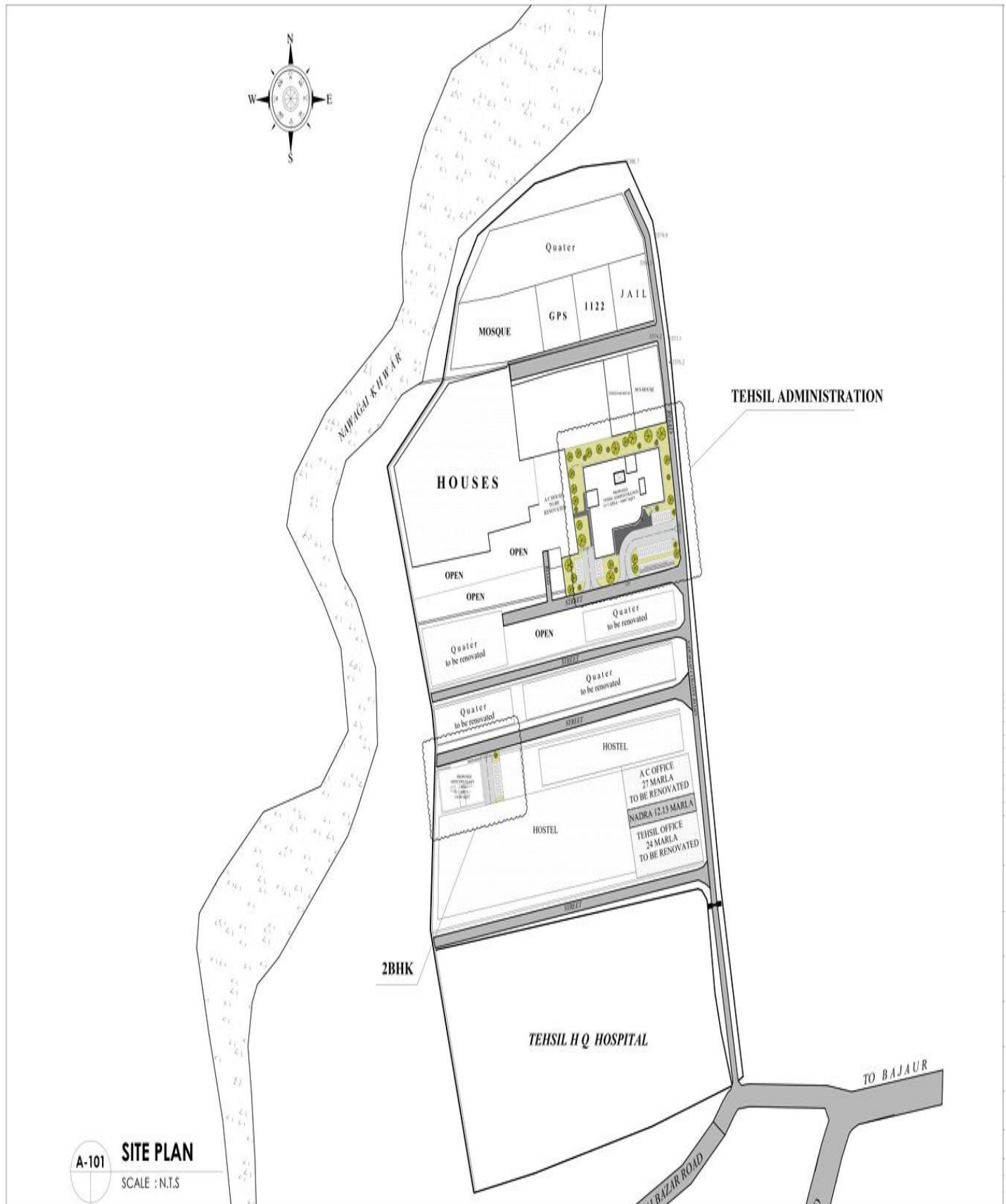
Details of Incident (e.g., to a worker or visitor) and Treatment		
Date of incident		
Time of incident		
Nature of incident	☐ Near miss ☐ First aid ☐ Medical treatment/doctor	
Name of injured person		
Address		
Occupation		
Date of birth		
Telephone		
Employer		
Activity in which the person was engaged 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	

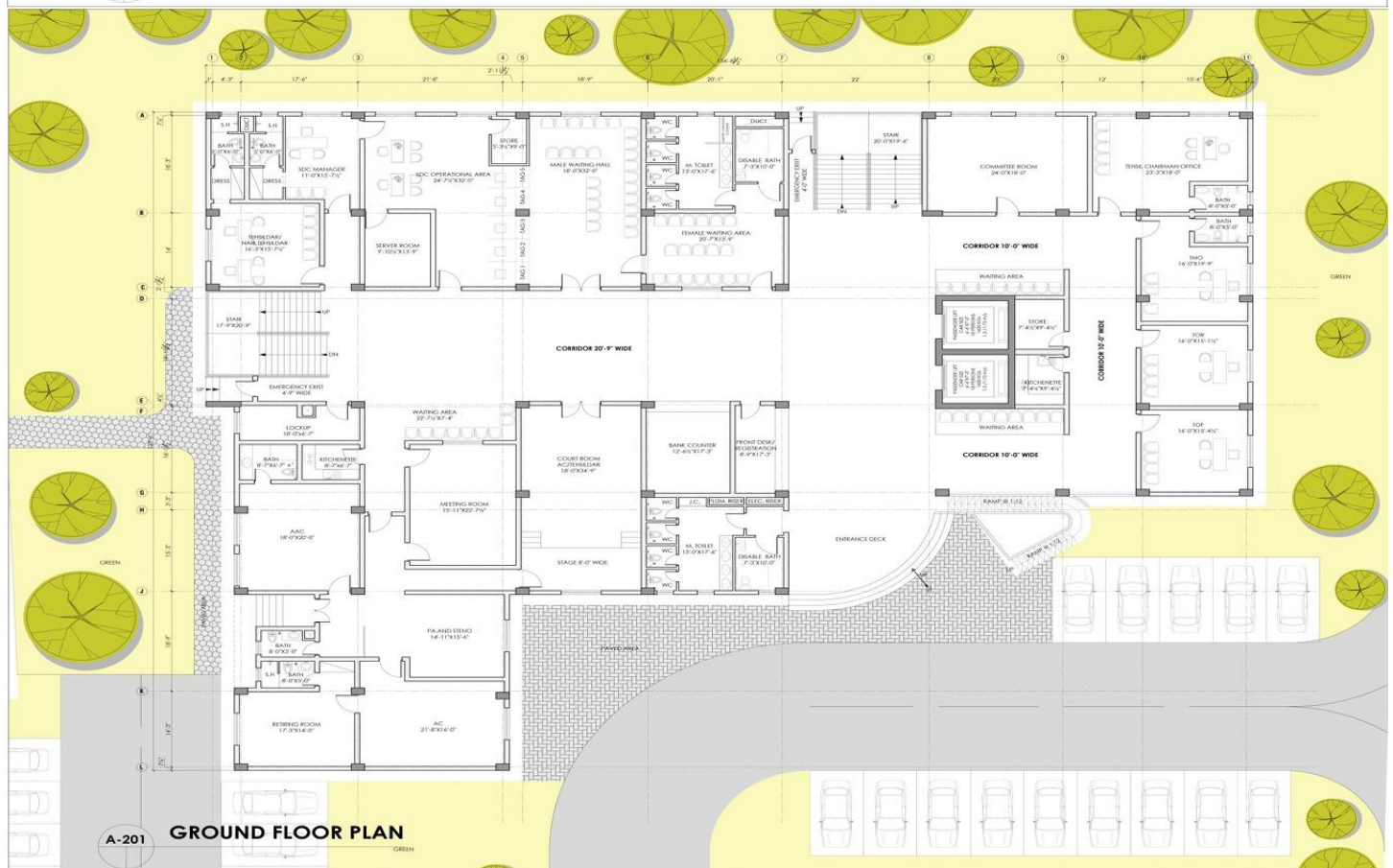
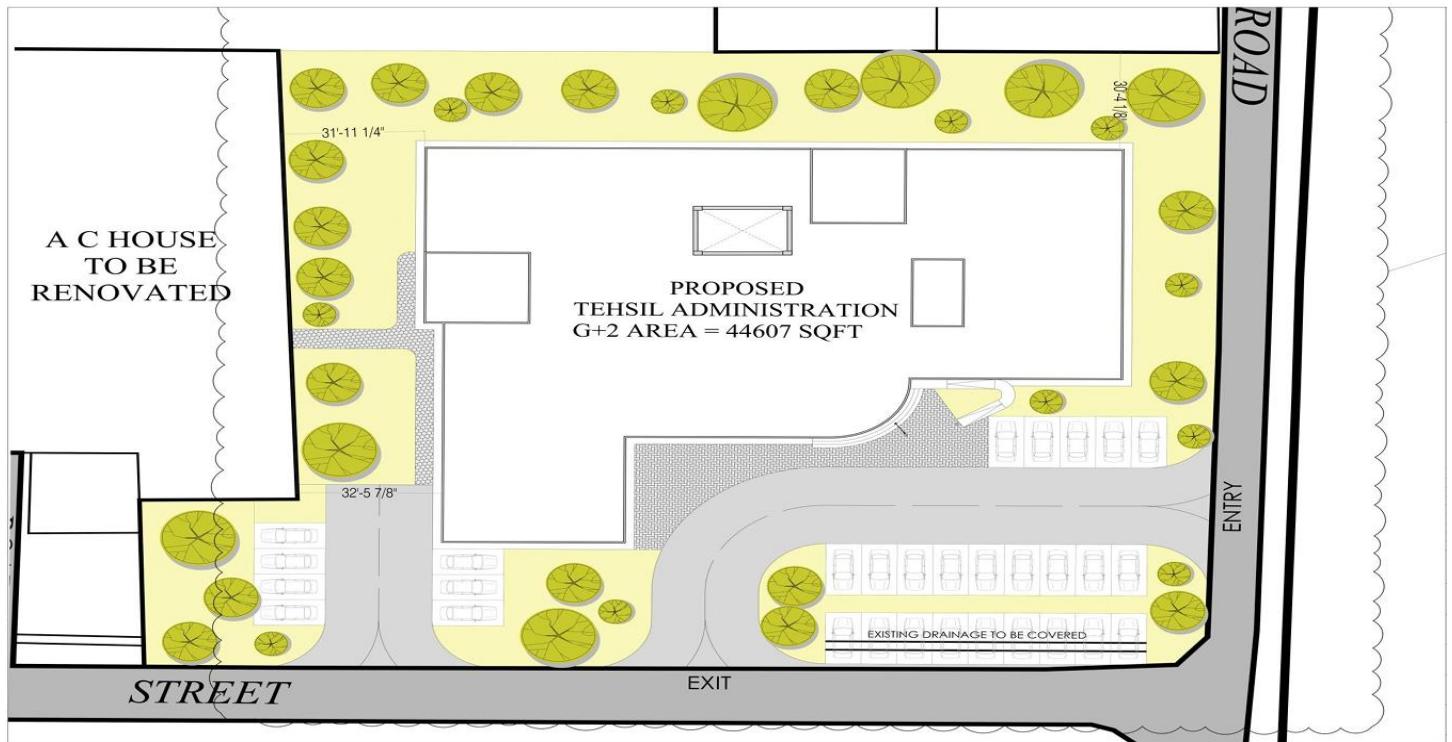
Annex 6. Maps and Architectural Diagrams

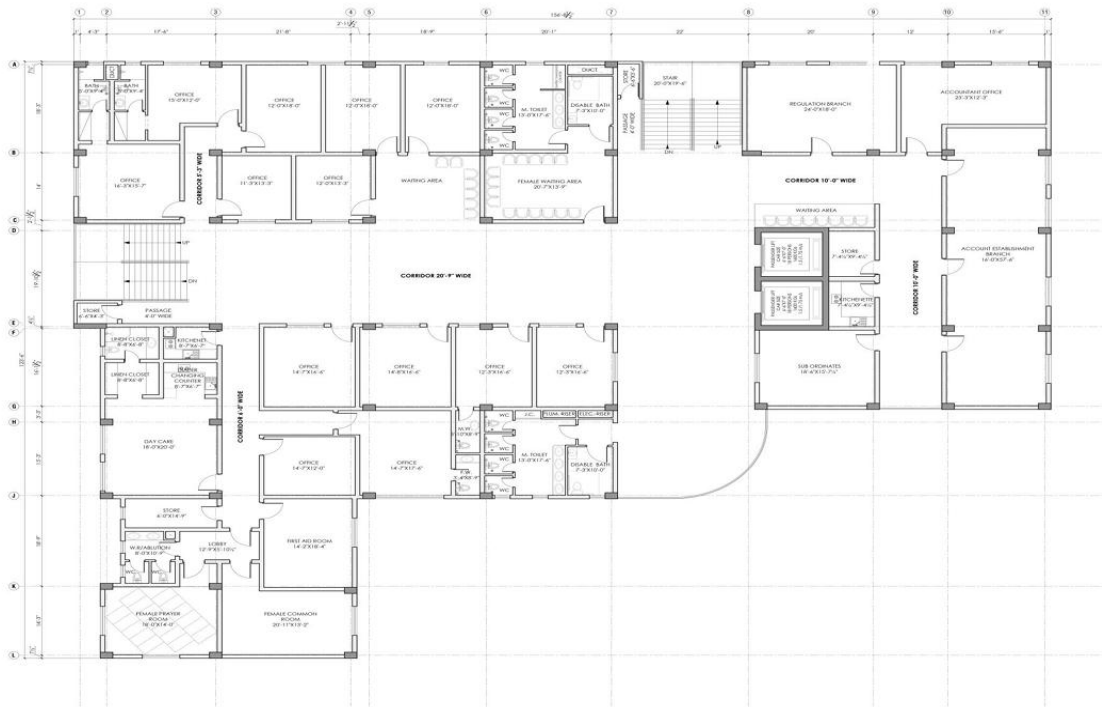




A-101 SITE PLAN
SCALE : N.T.S

Tehsil Complex architectural plan

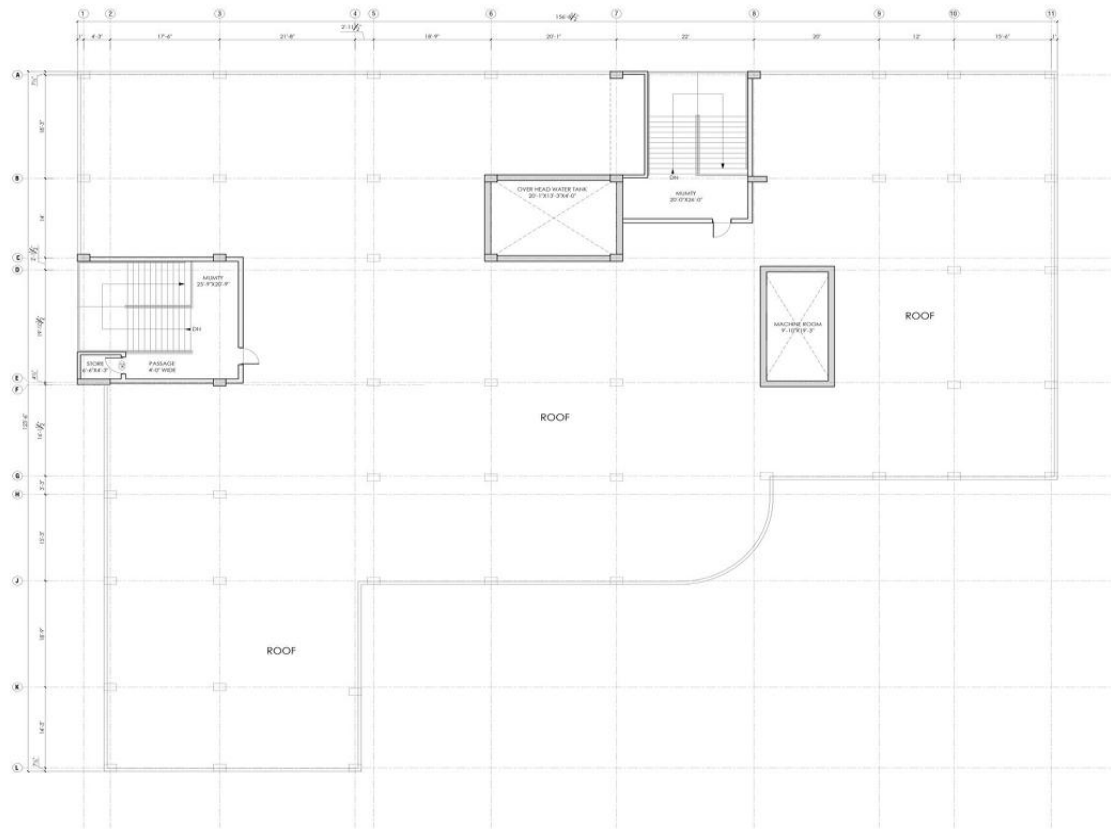




A-203 1ST FLOOR PLAN
SCALE 1"=1/8"



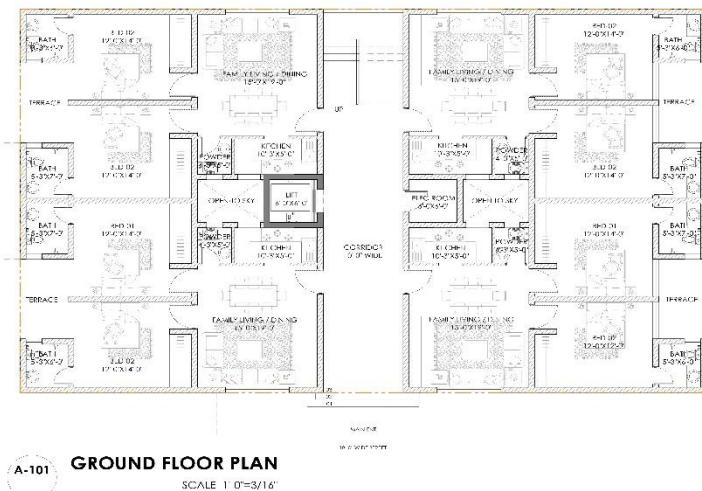
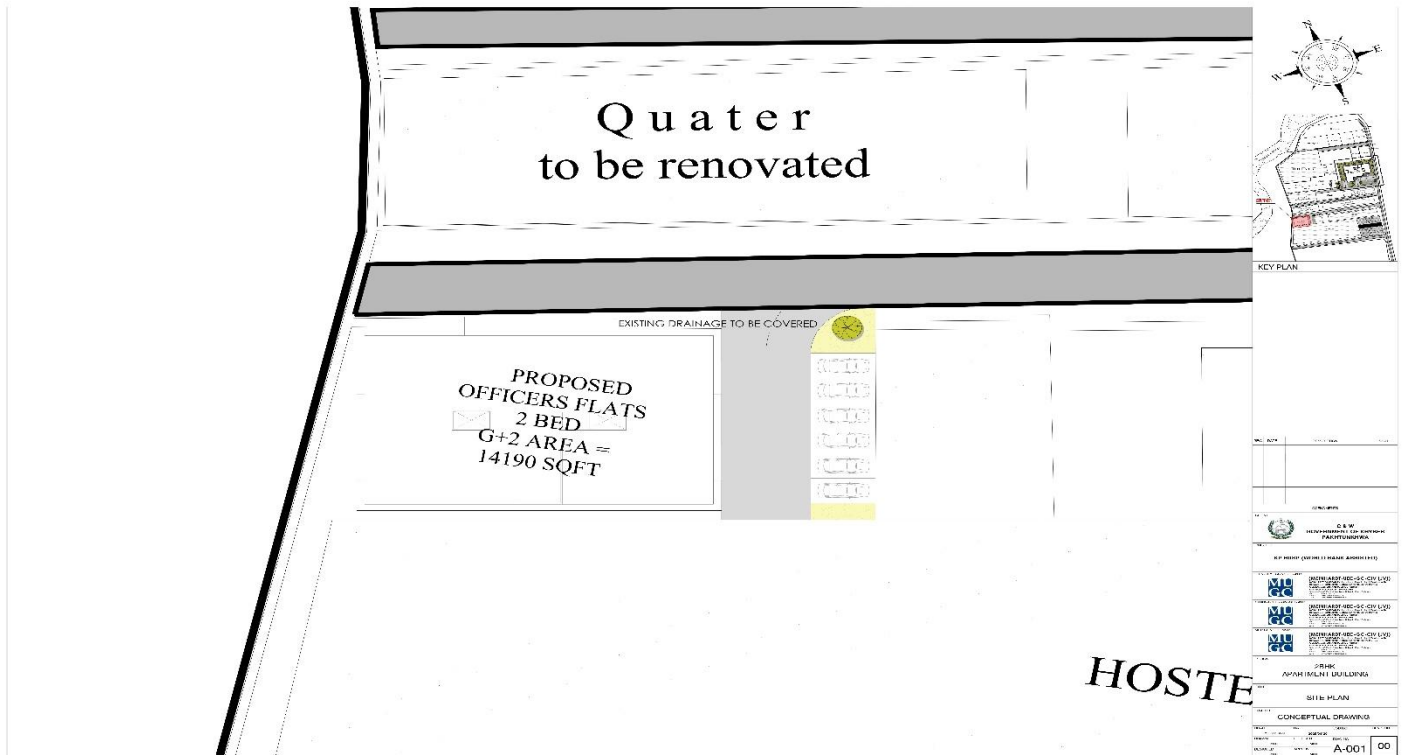
A-204 2ND FLOOR PLAN
SCALE 1"=1/8"



A-205 MUMTY FLOOR PLAN
SCALE 1"=0'-1 1/8"



Residential Complex architectural plan



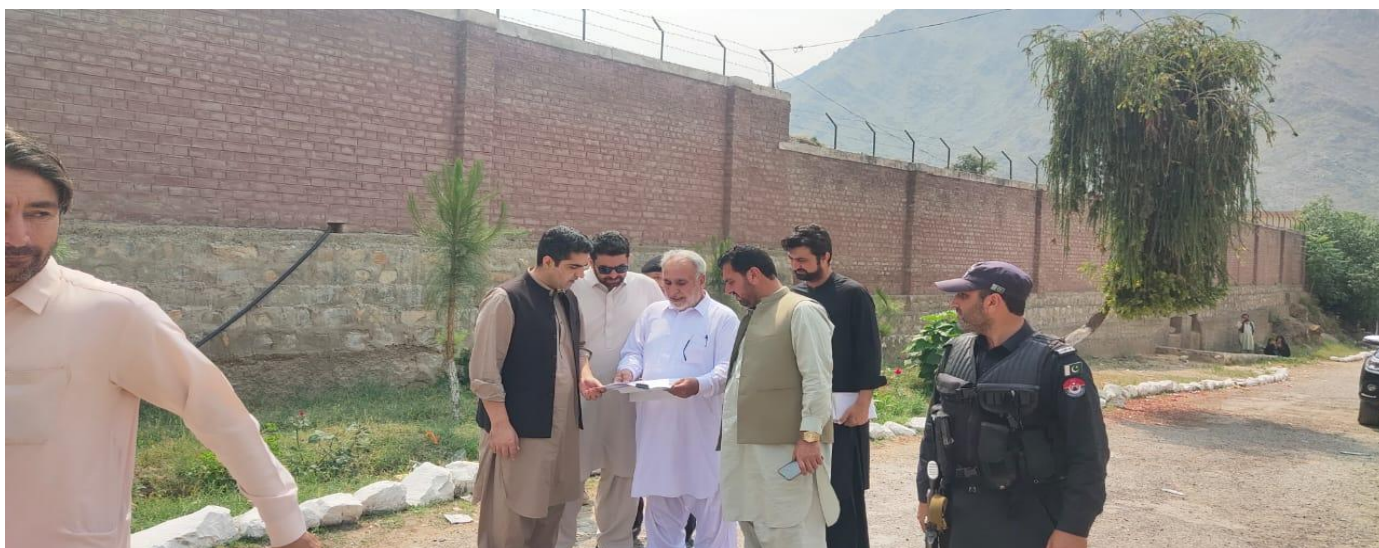
GROUND FLOOR PLAN
SCALE 1" = 3/16"



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



Stakeholders' consultation being held with the AC and the Tehsildar team of Nawagai, Bajaur



Proposed site for the residential complex (existing rest house structure)



Consultation at the Proposed tehsil complex site. Existing quarters will be demolished.



A view of the existing building of the rest house at the proposed Residential Complex Site (at the right) and quarters at left



A view of the proposed residential complex site (at the left) and existing jail building at the right.



A view of the proposed site for residential complex.



A view of jail building in the compound.



A view of the proposed residential complex (existing rest house) from outside



A view of the proposed residential complex site.



A view of the proposed residential complex site.



A view of the north end portion of compound.



A view of the Tehsil Headquarters Hospital.



A view of the NADRA Office.



Consultation with the staff of NADRA office.



A view of the existing rest house building at the proposed residential complex site.



A view of the proposed Tehsil Building Complex site.



A view of the Rescue 1122 Office.

Annex 8: Air, Water quality baseline test reports

i) Water Quality Test Report

Table 1: The Physicochemical properties of well water samples assessed for pH, electrical conductivity (EC), Turbidity, and total hardness (TH).

Samples code	Area name	Electrical conductivity $\mu\text{S}/\text{cm}$	Turbidity NTU/L	Total hardness mg/L	pH
S1	Zubandar	279.00n	0.510n	238.67o	7.363d
S2	Tangi	285.00m	0.770lm	259.33n	7.153i
S3	Sheikh Kaly	614.67a	39.500b	636.67a	7.513ab
S4	Loi Sum	591.33b	45.633a	580.67b	7.493ab
S5	Inayat kaly	320.00j	2.430j	362.67j	7.486b
S6	Patak	346.00h	4.686h	383.00g	7.310e
S7	Khar	567.00c	29.60d	534.67c	7.416c
S8	Taly	404.00e	24.520e	401.33d	7.030lm
S9	Raghagan	401.67e	4.160i	401.33d	7.530a
S10	Derakai	320.00j	1.133k	378.67i	6.950n
S11	Pashat	293.67l	0.510n	313.33m	7.253fg
S12	Laradagai	270.00o	0.550n	217.33p	7.086jk
S13	Ridawan	325.00i	6.223g	379.33hi	7.126ij
S14	Kotki	382.33g	2.596j	388.67f	7.430c
S15	Umary	325.00i	13.643f	381.33gh	6.876o
S16	Sewai	318.00f	24.520e	392.33e	7.010m
S17	Dabar	318.00j	0.840l	349.33k	7.283ef
S18	Malangy	261.00q	0.600mn	180.67r	7.056kl
S19	Kharkai	264.00p	0.550n	201.33q	7.230gh
S20	Amanatha	306.00k	0.510n	330.67l	7.2000h
S21	Nakhtar	414.33d	37.70c	378.67i	7.0900jk
WHO standards (WHO, 2011)		400	5	500	6.5-8.5
US-EPA limits (USEPA, 2009)		400	5	500	6.5-8.5
Pak-EPA (Pak-EPA, 2008)		400	5	500	6.5-8.

Source: Evaluation of Well Water Quality of District Bajaur, Pakistan

Hazrat Usman¹, Shakeel Ahmad^{2*}, Salah Uddin³, Humaira Wasila³ and Yasser Durrani⁴ Published | October 28, 2023

Table 2: Selected microbial characteristics of the water samples evaluated for Total coliforms, faecal coliforms and E.coli

Samples code	Area name	Total Coliform (MPN/100ml)	Fecal Coliform (MPN/100ml)	E-coli
S1	Zubandar	0.0000f	0.0000f	ND
S2	Tangi	7.0000e	7.0000e	ND
S3	Sheikh Kaly	15.000ab	14.333ab	+ive
S4	Loi Sum	12.000bcd	9.0000cde	+ive
S5	Inayat kaly	5.6667e	2.0000f	ND
S6	Patak	15.000ab	10.667cd	+ive
S7	Khar	16.000a	14.333ab	+ive
S8	Taly	1.3333f	0.6667f	ND
S9	Raghagan	0.0000f	0.0000f	ND
S10	Derakai	15.000ab	11.333c	+ive
S11	Pashat	1.3333f	0.0000f	ND
S12	Laradagai	0.0000f	0.0000f	ND
S13	Ridawan	11.000d	6.6667e	ND
S14	Kotki	13.000abcd	10.000cd	+ive
S15	Umary	11.000d	8.3333de	+ive
S16	Sewai	14.333abc	11.667bc	+ive
S17	Dabar	5.3333e	1.3333f	ND
S18	Malangy	0.0000f	0.0000f	ND
S19	Kharkai	0.0000f	0.0000f	ND
S20	Amanatha	11.667cd	7.0000e	+ive
S21	Nakhtar	15.000ab	15.333a	+ive
WHO standards (WHO, 2011)		OMP/100ml	OMP/100ml	-ive
US EPA limits (USEPA, 2009)		OMP/100ml	OMP/100ml	-ive
Pak EPA (Pak-EPA,2008)		OMP/100ml	OMP/100ml	-ive

Source: ASSESSMENT OF HEAVY METALS AND MICROBIAL PRESENCE IN THE WELL WATER OF DISTRICT BAJAUR, PAKISTAN

- **Hazrat Usman** - Department of Food Science and Nutrition, University of Minnesota, Twin Cities, USA. **Shakeel Ahmad** - Department of Nutrition and Food Hygiene, School of Public Health, Nanjing Medical University, Nanjing 211166, China.
- **Salah Uddin** - Department of Human Nutrition, The University of Agriculture, Peshawar, Pakistan.
- **Yasser Durrani** - Department of Food Science and Technology, The University of Agriculture, Peshawar, Khyber Pakhtunkhwa, Pakistan.
- **Humaira Wasila** - Department of Human Nutrition, The University of Agriculture, Peshawar, Pakistan

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ii) Air Quality Test Report

Air Quality Analysis, Nawagai, District Bajaur on October 11, 2025

S No.	Parameters	Standard	Result
1	PM _{2.5}	50 µg/m ³	119 41 µg/m ³
2	PM ₁₀	67 µg/m ³	88 72 µg/m ³
3	NO ₂	44 µg/m ³	45 23 µg/m ³
4	O ₃	98 µg/m ³	14 41 µg/m ³
5	SO ₂	7 µg/m ³	3 3 µg/m ³
6	CO	269 µg/m ³	3 334 µg/m ³

Source: <https://www.accuweather.com/en/pk/nawagai/259179/air-quality-index/259179>

PM_{2.5}

Unhealthy

Fine Particulate Matter are inhalable pollutant particle with a diameter less than 2.5 micrometres that can enter the lungs and bloodstream, resulting in serious health issues. The most severe impacts are on the lungs and heart. Exposure can result in coughing or difficulty breathing, aggravated asthma, and the development of chronic respiratory disease.

119

41 µg/m³

PM₁₀

Poor

Particulate Matter are inhalable pollutant particles with a diameter less than 10 micrometres. Particles that are larger than 2.5 micrometres can be deposited in airways, resulting in health issues. Exposure can result in eye and throat irritation, coughing or difficulty breathing, and aggravated asthma. More frequent and excessive exposure can result in more serious health effects.

88

72 µg/m³

NO₂

Fair

Breathing in high levels of Nitrogen Dioxide increases the risk of respiratory problems. Coughing and difficulty breathing are common and more serious health issues, such as respiratory infections can occur with longer exposure.

45

23 µg/m³

O₃

Excellent

Ground-level Ozone can aggravate existing respiratory diseases and also lead to throat irritation, headaches, and chest pain.

14

41 µg/m³

CO

Excellent

Carbon Monoxide is a colourless and odourless gas, and when inhaled at high levels can cause headache, nausea, dizziness, and vomiting. Repeated long-term exposure can lead to heart disease

3

334 µg/m³

SO₂

Excellent

Exposure to Sulfur Dioxide can lead to throat and eye irritation and aggravate asthma as well as chronic bronchitis.

3

µg/m

iii) Soil Quality Test Report

Although there is a wide range of soil types, over 60 percent of the area ranges from moderately coarse to medium fine in soil texture. All these soils are suitable for irrigation from a textural standpoint and can produce very good crop yields if managed properly.

The soil of the area is clay loam, non-calcareous, non-saline, and non-sodic in nature. Soil pH is slightly alkaline. The soils are low in organic matter and nitrogen content, low in phosphorus, and medium in potassium content.

Annex 9: Coordinates of the Proposed Site

Site	Area	Coordinates
Tehsil Complex Nawagai, District Bajaur	Tehsil & Residential Complex Total Area 43.43 Kanal	3805777.4545 9996287.3097
		3805784.4984 9996247.9348
		3805774.8000 9996218.0900
		3805783.0500 9996170.4200
		3805297.9900 9996083.0300
		3805285.9300 9996159.6007
Residential Complex Nawagai, District Bajaur		3805634.5900 9996590.9400
		3805752.2060 9996507.5332
		3805671.7700 9996454.0300
		3805685.1400 9996353.9200
		3805781.1378 9996330.1924
		3805245.5193 9996317.0999
		3805264.4912 9996235.9630
		3805207.8061 9996450.1965
	3805319.9000 9996560.1500	
	38054441.5222 9996586.1323	

Annex 10: Participants' list of Stakeholders' Consultation

- Mr. Faisal Ismail, Assistant Commissioner Nawagai, District Bajaur, KP
- Mr. Abdul Wakeel, Tehsildar Nawagai, District Bajaur, KP
- Mr. Muhammad Nawaz, Chief Resident Engineer, MUGC / PIU C&W
- Mr. Usman Shinwari, Deputy Director (E&S), PIU C&W
- Mr. Sarfaraz Khan, Civil Engineer, MUGC, PIU C&W
- Mr. Noor Hakeem, Sub-Inspector Nawagai, Bajaur, KP
- Mr. Rehman Khan, NADRA Office staff, Nawagai Bajaur, KP
- Mr. Ali Farman, Tehsil Headquarters Hospital staff, Nawagai Bajaur, KP

Annex 11: Code of Conduct



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

Site Selection & Layout (Camps should be located away from hazardous zones. Proper drainage, waste disposal, and safe access to work sites. Adequate spacing to prevent overcrowding.)

Accommodation Standards (Minimum floor space per worker, with ventilation and lighting. Durable structures with fire safety provisions.)

Water Supply & Sanitation (Continuous supply of safe drinking water. Adequate toilets, bathing, and washing facilities. Proper sewage and wastewater disposal systems.)

Waste Management (Solid waste collection, segregation, and safe disposal. Pest and vector control measures to prevent disease outbreaks.)

Health & Safety (On-site first aid and access to medical services. Emergency response plan (fire safety, evacuation routes). Regular health checks and vaccination programs.)

Food & Nutrition (Hygienic kitchens and dining facilities. Compliance with food safety standards.)

Worker Welfare & Social Facilities (Access to communication (internet, phone). Transportation to/from work sites.)

Labor Rights & Compliance (Adherence to national labor laws and international standards (ILO conventions, World Bank/IFC guidelines). Transparent contracts, fair wages, and regulated working hours. Prohibition of child labor and forced labor.)

Grievance Redress Mechanism (Confidential system for workers to raise complaints. Clear procedures for resolution and feedback.)

Monitoring & Reporting (Regular inspections of camp conditions. Documentation of compliance with health, safety, and welfare standards.)

Annexure 13: Components of Site Specific OH&S Plan

Risk Assessment & Planning (Conduct hazard identification and risk assessments before starting work. Develop site-specific safety plan tailored to construction activities. Integrate OHS requirements into contracts and project schedules.)

Clear Roles & Responsibilities (Assign safety officers or supervisors to oversee compliance. Ensure subcontractors understand and follow OHS obligations. Establish accountability through documented responsibilities.)

Training & Awareness (Provide induction training for all workers before site access. Conduct toolbox talks and refresher sessions on high-risk activities, e.g., scaffolding, excavation)

Safe Work Procedures (Implement permit-to-work systems for hazardous tasks, e.g., confined spaces, hot work. Enforce PPE (Personal Protective Equipment) use, such as helmets, gloves, and harnesses. Maintain equipment and machinery to prevent accidents.)

Site Safety Controls (Provide barriers, signage, and traffic management plans to protect workers and the public. Ensure proper scaffolding, fall protection, and excavation safety measures. Maintain hygiene facilities and emergency exits.)

Monitoring & Reporting (Conduct regular inspections and audits to identify unsafe practices. Establish incident reporting and investigation systems.)

Emergency Preparedness (Develop emergency response plans, including fire, medical, structural collapse, etc. Provide first aid stations and trained personnel. Coordinate with local hospitals or emergency services.)