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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 DISTRICT, TEHSIL OFFICES AND RESIDENCE COMPLEX, KHAR DISTRICT, BAJAUR

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Prepared for the
Communication & Works Department KP

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List of Acronyms

Construction Contractors	CC
Communication & Works Department	C&W Department
Environmental Engineer	EE
Environmental Impact Assessment	EIA
Environment Protection Agency	EPA
Environmental Protection Ordinance	EPO
Environmental and Social Framework	ESF
Environmental and Social Management Plan	ESMP
Environmental and Social Standards	ESS
Federally Administrated 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 these subprojects, a new District Administration, Tehsil Administration, and Residence Complexes in Khar (Bajaur District) will be developed on separate plots measuring 13 kanals, 8 kanals, and 39 kanals of land, respectively, to address the critical administrative and residential needs of the office and residential accommodation. The complexes will house offices for: District, Tehsil Administration, and line departments. And residential units for government staff, along with parks, green spaces, and secure waiting areas.

Khar, Bajaur has environmental and social challenges: some areas show good water quality, others face challenges with high turbidity, hardness, microbial contamination, and water scarcity. 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 for the Khar Offices and Residential Complex, comprising three subprojects, is PKR 21,810,000/- 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 proposed subproject sites are located inside the Government Colony on the Munda Khar Road in Khar Town, District Bajaur. The site coordinates and pictures of the sites, showing the existing situation, are placed in Annexure 9. The main aim of the proposed subproject complexes is to cater to the office and accommodation needs of the growing number of Government Officials and employees at the District and Tehsil headquarters, District Bajaur. The specific objectives of the proposed subprojects are:

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

During the preparation of E&S screening checklist of the subprojects it has been observed that the construction activities of the proposed Complexes 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. Therefore, the ESMP's key focus is on air and water pollution control, noise and vibration mitigation, soil conservation measures, sustainable drainage planning, solid waste management, and detailed health and safety measures.

2.3 Project Components

The proposed subproject involves three new building complexes on three different plots within the same Government colony. The new District Office complex site is a 13 kanals plot, the Tehsil complex site is an 8 kanals plot, and the Residence complex site is a 39 kanals plot of land. The three complexes have the following components:

1. One block having Basement + Ground + 3-storied Office building for District Administration and line Department Offices.
2. One Office block having Basement + Ground + 2-storied building for the Tehsil Administration and line departments' offices.
3. 7 Number of Officer Residences
4. Two blocks of 2-bedroom residential apartments having ground + 3 storied for the District and Tehsil Administration Officials.
5. The residence complex also includes two parks, Badminton and Basketball courts, a jogging track, and green open areas with a plantation.

In addition to the proposed new construction of buildings for District and Tehsil Offices and residential accommodation, the subproject includes the demolition of one existing, depleted office building to make available the required space for the new proposed Tehsil complex. The details of the building to be demolished are as under:

1. Tehsil Administration Office building

The new proposed District and Tehsil Offices complexes provide Offices, meeting rooms, courtrooms, male and female visitors waiting areas, public washrooms (both males and females), kitchens on each floor, a praying area, service and circulation areas for easy access, and car parking facilities for officials and visitors.

The proposed sites for the subprojects are located inside the Government colony. The entire land of the colony has been in the possession of GoKP for the last 50 years; therefore, no land acquisition is required for the construction of the proposed District, Tehsil, and residence complexes at the proposed sites.

2.4 Area of Influence of the Subproject

The proposed District, Tehsil, and Residence complexes subproject sites are located inside the Government Colony on the Munda Khar Road in Khar town. The subproject site's area of influence within a radius of 500 m includes the school, mosque, Offices of various line departments, and the Government Officials' residences within the colony. Around or slightly more than a 1 km radius are the District Hospital, Pakistan Army Compound, banks, and the main Bazaar of Khar Town.

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 related 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 5**: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- **Environmental and Social Standard 10:** Stakeholder Engagement and Information Disclosure.

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

3.2 National and Provincial Legal and Regulatory Framework

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

***4. Projects requiring an EIA or IEE or GEA*.---**Where the project falls 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.

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 E&S expected impacts of the subproject are moderate; therefore, the "General Environment Assessment (GEA) will fulfill the regulatory requirement. A formal approval of the EPA, KP will be obtained before the start of the construction of the proposed subprojects as per the rules of the EPA, KP.

4. ENVIRONMENTAL AND SOCIAL BASELINE

4.1 Environmental Baseline

The environmental baseline for Khar Town, Bajaur District, is characterized by a hilly, rugged, and arid terrain. The climate is extreme, with cold, harsh winters and potentially hot summers, especially in the central areas. Deforestation is a significant issue, leading to barren hills. The area is known for its natural springs and historical sites, with some regions experiencing monsoon rainfall.

Biological Environment

The biological environment of Khar, Bajaur, in Khyber Pakhtunkhwa (KP), Pakistan, includes diverse flora and fauna, particularly birds, with a mix of hilly and agricultural land. The region features both natural forests and plantations, and its climate is characterized by extreme temperatures, especially during winter.

Topography and Land Use: The district is primarily hilly, rugged, and arid, with a significant portion of the hills being barren. Excessive deforestation has led to the denudation of the hills. Bajaur's mountainous and hilly terrain with mountain ranges reaching a height of 3,000 meters in the northern part of the district. The terrain height gradually declines towards the south, with peaks slightly above 2,500 meters on the southern border, and continues to decrease in the central part of the district. It is a transition zone between the Hindu Kush mountains and the lower plains, creating a diverse landscape. The topography of Khar Town is a mix of flat and undulating areas, with steep hills on its north and south boundaries.

Climate: The overall climate of Bajaur is described as extreme, with very cold winters and potentially hot summers. Khar has a semi-arid to arid climate. Summers are hot, with temperatures ranging from 30 to40°C. Winters are especially harsh, featuring heavy rainfall and snowfall, particularly in the northern and southern hills. Winter temperatures range from 0 to 10°C. The area receives an annual average rainfall of 400-600 mm, which occurs mainly during monsoon (July–September) and winter rains (December–February). The subproject sites are not prone to flash floods, and there is no historical evidence of flash floods in the existing Government colony, Khar, where the subproject sites are located.

Soil Morphology: The soils of Khar Town are generally fertile, with a texture ranging from silty loam to loam and a moderate amount of organic matter, suitable for cultivation. Alluvial soil, derived from amphibolite terrain, covers much of the area, especially around Khar and north of Sarkasi Qila. Soils in some areas may be relatively shallow, particularly in hilly or mountainous regions. Areas with steep slopes may be susceptible to soil erosion, especially during heavy rainfall.

Flora and Fauna: The Tehsil Khar in Bajaur District is characterized by a diverse range of flora and fauna, reflecting its hilly, arid, and sometimes forested terrain. Herbs, shrubs, and trees are the main components of the flora in Tehsil Khar. Key aspects include subtropical pine and broad-leaved forests, with various plant species. The leading plant families include Lamiaceae, Solanaceae, and Asteraceae. Various plants are used for traditional medicine, including Foeniculum vulgare, Juglans regia, Mentha longifolia, and Marubium vulgare. At the subproject site, the specific flora includes: Chir Pine (Pinus Roxburghii), Chinar (Platanus orientalis or Oriental Plane), Sarva (Cupressus semipervirens), Mulbarry (Morus rubra), and Diar (Deodar Cedar) In fauna, the area is home to the common leopard, black bear, wolf, and rhesus monkey. There are 83 native bird species found in Bajaur, including Chakor, Gray Partridge, Black Partridge, See-see Partridge, Kalij Pheasants, and Waterfowl.

Physical Environment

The water resources, water, air, and soil quality of the Tehsil Khar, as well as the district Bajaur, are reasonable in general. The area having the highest population concentration has an issue with the quality of these factors.

Water Resources: The natural resources of water in the area are springs and rivers. The famous rivers come from Charmang and Mamond, which unite at Musa Kas to form the River Khar, which then meets with the River Pashat in Jar to form the River Bajaur. The underground water quality in Tehsil Khar varies. While some areas show good water quality, others face challenges with high turbidity, hardness, and microbial contamination. Turbidity, a measure of water clarity, varies significantly, with some regions showing high turbidity (up to 45.633 NTU), indicating poor water quality. Total Hardness ranges from 180.67 mg/L to 636.67 mg/L, indicating varying levels of mineral content. pH values ranged from 6.87 to 7.53, indicating acidity or alkalinity levels. Microbial Contamination, some water samples exceed the permissible limit for coliforms (0.00 MPN/100ml), suggesting potential fecal contamination. The declining groundwater level and limited surface water sources contribute to water scarcity in the region. The underground water is available at 320 feet, and water quality analysis is placed at Annex-8. In the Government Colony, Khar Town, there is no underground sewerage system, and all the existing buildings have septic tanks for the wastewater collection and disposal.

Ambient Air Quality: The air quality in Khar, Bajaur, is a concern due to increasing vehicular traffic, industrial emissions, 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.

Noise Level: The noise level data in Khar, Bajaur District, is not available in secondary sources data and will be taken as baseline at the pre-construction stage to establish the baseline.

Soil Quality: The beds in Khar Urban Centre are composed of young alluvium deposits and have varying characteristics such as organic content, moisture retention, and acidity. They are generally considered to be fertile, with textures ranging from silt loam to loam and containing a medium level of organic matter. The soil quality analysis is provided in Annexure 8.

4.2 Social Baseline

Tehsil Khar in Bajaur District has a rich social baseline characterized by a strong tribal structure, predominantly Sunni Muslim population, and a history of both relative autonomy and external influence. The area is known for its hardworking and hospitable people, particularly those from the Utmankhel and Tarkani tribes.

Population: As per the 2023 census, Bajaur District had a population of 1,287,960. The district is home to 181,699 households. The sex ratio is 102.14 males per 100 females. The Annual Population growth rate (2017-2023) is 2.8%. The District Bajaur has an area of 1,290 km^2 and a population density of 998.4 people per km^2. While the Tehsil Khar has a total population of 301,778, including 152,978 males and 148,798 females. The Tehsil population has an annual growth rate of 3.41%. The overall Tehsil has an area of 238 km^2 with a population density of 1,267.97 per km^2.

Socioeconomic Factors: A significant portion of the population is involved in agriculture. Subsistence-level agriculture, with its allied livestock breeding and fishing, is the major employer. Other activities include small-scale businesses, mining, and elementary occupations. Immigration to the southern districts in search of jobs or other labor is common. While the literacy rate was low in the past, there have been efforts to improve education, particularly in the last decade.

Literacy Rate: The literacy rate is 26.26%, with 39.89% for males and 12.29% for females. There are 15 primary schools for boys and 12 primary schools for girls in Khar Urban Centre. There are 5 middle schools for boys and only 1 middle school for girls. Similarly, there are 5 high schools for boys and 2 high schools for girls. There is one higher secondary school each for boys and girls, along with one college and one polytechnic institute, which provide education to both boys and girls. there are 3 IHCs providing education only to girls.

Health Facilities: There is only one Type-A hospital located in the Khar Urban Centre. The bed strength of the hospital is 530, and it serves not only the population of Khar Urban Centre but also the entire district. The only District Head Quarter Hospital (DHQ) makes it difficult to serve the entire region. The breakdown of the health facilities in Khar Town is 1 Government Hospital (DHQ), 5 Government Dispensaries/ MCH, and 25 Private Hospitals/Clinics.

Cultural and Historical Significance: Khar was previously a princely state with a Nawab, and the area has experienced periods of both relative peace and conflict, including the impact of the War on Terror. Khar and the surrounding areas have historical sites like Gabbar Cheena, Seri-sar, Sikandaro, Kohimore, and others.

5. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

5.1 Public Consultation

The E&S Meinhardt team, PIU C&W, had visited the District and Tehsil Administration and identified the most relevant stakeholders for engaging them for fostering collaboration and gathering feedback from identified stakeholders to ensure the project's success, sustainability, and identify potential impacts and opportunities during the construction phase of the proposed subprojects. A detailed consultation was held on May 7, 2025, in the District Administration Office Khar, District Bajaur with all the stakeholders to ensure that the proposed project is aligned with the specific needs and context of the region, promoting sustainable development and minimizing potential negative concerns, the list of the participants is in Annex 10. The views of the participants are:

- In view of stakeholders, the proposed subproject sites will allow for the consolidation of multiple government offices, promoting administrative efficiency.
- They considered it accessible for all groups, including women, the elderly, and persons with disabilities. Basic mobility needs such as paved paths, adequate lighting, and proximity to public transport are available at the sites of proposed subprojects.
- In their view, the main advantage is site approximately 1 km from the main Khar Bajaur bazar, making it easily accessible.
- Sites for all three complexes (District, Tehsil, and Residence) are located inside a guarded compound, providing a secure environment, particularly for women and children.

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

Table 1: Stakeholder Recommendations and the Respective Response

Serial No.	Stakeholder Recommendation	Response to their Recommendation
1.	Suggested to incorporate design elements to facilitate access for the elderly and special persons' needs.	It will be incorporated in the building at the time of the finishing stage of construction.
2.	For more improvements, measures to cater to women's needs, such as separate facilities or prioritized services.	Incorporated in the Design of the building like separate female washrooms, separate female waiting areas, daycare facilities, prayer areas and a separate female desk.
3.	Ensure the new buildings are designed to meet the needs of diverse users, promoting equality and accessibility.	Incorporated in the Design of the building.

5.2 Stakeholder Identification and Analysis

The purpose of stakeholder identification and analysis is to systematically identify individuals, groups, and organizations who may be affected by or have an interest in the proposed project activities in Khar Bajaur District. , and to assess their roles, influence, and communication needs. 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 project. They are primary stakeholder, those individuals and groups directly affected, positively or negatively, by the project. There are secondary stakeholders, who include parties 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 Stakeholder		
1.	Deputy Commissioner, District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
2.	SDO, Highway, District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
3.	SDO Buildings, District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
4.	Agriculture Officer, District Bajaur,	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
5.	Community Officer, Forest Division, District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
6.	Planning Officer, P&D District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
7.	Engineer, P&D District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
8.	In-charge, Revenue & Estate District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.

9.	Engineer – District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
10.	Local Community Activist	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
11.	Deputy DO Education – District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
12.	SDO Education – District Bajaur	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
13	Surroundings Area Residents and Families of the Government Officials	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction.
14	Vulnerable and Marginalized Groups (Families living in the 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.
15	Teachers and Students	Concerned about potential impacts such as noise, dust, water access, traffic movement, and disturbance in routine academic activities due to construction
Secondary Stakeholders		
16	Local Religious Leaders (Imams, Pesh Imams)	Hold moral authority and can influence public perception of the project
17	Tribal Elders and Jirga Members	Guide land use, tribal customs, and local conflict resolution
18	Local Administrative Authorities (Tehsil and District Level)	Involved in need assessments, land coordination, law and order, and service delivery.
19	Environmental Protection Agency, Khyber Pakhtunkhwa (EPA-KP)	The regulatory authority is responsible for ensuring environmental compliance and reviewing ESMP documentation.
20	Contractor (s) and Construction Workers	Involved in implementation; requires clear orientation on social and environmental safeguards.
21	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 subprojects under the ESMP in District and Tehsil Khar 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.

Table 3: Engagement Activities and Methods (During Construction)

Activity	Target Stakeholders	Frequency	Communication Method	Responsibility
Community Briefings	District, Tehsil Officials in the surrounding Offices, Residents (male and female), and local community-based organizations.	Monthly	Customized meetings with officials, public meetings, mosque announcements, and community centers	Contractor's social staff, Supervision Consultant Social Staff
Information Disclosure	For the concerned general public of the compound and visitors to the compound.	Ongoing	Posters, notice boards, Urdu & Pashto pamphlets	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 of the contractor and the Supervision Consultant
Grievance Redress Mechanism (GRM) Activation	All concerned stakeholders	Continuous	Complaint boxes, hotline, in-person reporting, and all intake measures as these become available	Grievance Officer of PIU
On-site Signage & Safety Notices	General public, labor, and visitors to the area	Continuous	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

As mentioned in the scope of the subprojects, the District Administration, the Tehsil Administration and the Residential Complexes will be built on separate plots; since all of these sites are within the same Government colony, one combined ESMP has been prepared for the subprojects. The Environmental and Social Management Plan (ESMP) provides the framework for the implementation of the mitigating measures and environmental management and monitoring during the construction and operation phases of the proposed project. The proper implementation of the ESMP will ensure that any adverse environmental impacts are adequately mitigated, either totally, prevented, or minimized to an acceptable level, and required actions to achieve those objectives are successfully taken by the concerned institutions or regulatory agencies. The implementation of ESMP will be carefully coordinated with the design, construction, and operation programs of the project to ensure that relevant mitigation measures are implemented at the appropriate stage and adequate resources are properly allocated to achieve the desired results. Furthermore, this ESMP should be part of the "Bidding Documents" of the subprojects and its mitigation measures costed and budgeted.

Table 4 depicts impacts, targets, mitigations and the responsible authorities for the implementation of the mitigation measures during design, construction and operational phases.

Table 4: Environmental Management Plan

Sr. No.	Parameters	Target	Mitigation	Responsibility
Design/pre-construction Phase				
1	Design & Layout Planning	Intended to fulfil all the desired needs of the District and Tehsil Administration, enhance all three of the complexes' aesthetics, and focus on the functional aspects of the complexes.	▪ All structural, layout, and engineering design of the Tehsil complex should strictly follow the applicable. ▪ e laws and engineering parameters.	PIU, C&W
2	Drainage	To prevent flooding and pooling	▪ Provision of appropriate drainage facilities and structures should be provided in the building complex. ▪ Proper slopes shall be incorporated in the design feature to avoid the formation of a water layer on road surfaces in rainy seasons.	PIU, C&W
4	Seismic Hazard	To minimize the structural damage	▪ The proposed building and structures will be designed and constructed to withstand low to moderate earthquakes.	PIU, C&W
5	Traffic Management	To minimize traffic problems in the subproject areas	▪ A proper traffic management plan shall be formulated and announced before construction to avoid traffic jams/public inconvenience.	PIU, C&W

			▪ Plan the timing for the movement of construction materials carrying vehicles to reduce traffic load and avoid inconvenience to the residents.	
6	Health and Safety	To minimize health risks	▪ Preparation of a health and safety plan to minimize health risks; and ▪ An emergency response plan should be formulated that emphasizes a line of action for rescue, medical emergencies, natural disasters, and firefighting operations.	PIU, C&W
7	Solid Waste Management	To manage (i.e., collect and dispose) the solid waste safely at appropriate sites.	▪ Incorporate technical design features for refuse collection and safe disposal at sites that would minimize burning impacts; and ▪ Devise plan(s) for safe handling, storage, and disposal of harmful materials	PIU, C&W
Construction Phase				
1	Noise and Vibration	To minimize noise pollution	▪ 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; ▪ Providing the construction workers with suitable hearing protection like ear caps or earmuffs, and training them in their use; ▪ Restricting construction vehicles' movement during nighttime; ▪ Avoid the use of heavy drill machines to avoid the vibration effect on the surrounding buildings. ▪ Vehicles and equipment used should be fitted, as applicable, with silencers and properly maintained; ▪ Use of low-noise machinery or machinery with noise shielding and absorption; ▪ Contractors should comply with the submitted work schedule, keeping noisy operations away from sensitive points; implement regular maintenance and repairs; and employ strict implementation of operation procedures	Supervision Consultant (SC), Construction Contractor (CC)

2	Soil Erosion	To minimize soil erosion and contamination.	▪ All spoils shall be safely disposed off as desired, and the site will be restored to its original conditions; ▪ Unnecessary excavations at the subproject's sites should be avoided; ▪ Septic tanks 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 stations; 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.	CC, SC
3	Air Pollution	To minimize air pollution	▪ During the demolition of the existing building, in one subproject, the area will be cordoned off with a safety barrier net properly to confine and protect the spreading of dust particles from the demolition process. ▪ All excavation work will be sprinkled with water to control dust. ▪ The excavated material shall be covered and shall not be stored for long intervals. ▪ Preventive measures against dust should be adopted for on-site mixing and unloading operations. Regular water sprinkling of the site should be carried out to suppress excessive dust emissions. ▪ All vehicles, machinery, equipment, and generators used during construction activities should be kept in good working condition and be properly tuned and maintained to minimize the exhaust emissions. ▪ 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; ▪ Filter shall be installed at the point sources (machinery or equipment) of air emissions and shall be replaced regularly; ▪ Emissions from power generators and construction machinery are important point sources at the construction sites.	CC, SC

			Proper maintenance and repair 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 from any kind of pollution due to the subproject	▪ Protection of groundwater reserves from any source of contamination, such as construction and oily waste that will 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. ▪ The solid waste will be disposed off in designated landfill sites to protect underground water contamination. ▪ Water required for construction is obtained in such a way that the water availability and supply to nearby communities remain unaffected. ▪ For construction purposes, all efforts should be made to draw water from the nearby surface water bodies with priority. ▪ Regular water quality monitoring according to a determined sampling schedule. ▪ The contractor shall ensure that construction debris does not find their way into the drainage network, which may get clogged. ▪ Prohibit washing of machinery and vehicles in surface waters, provide sealed washing basins, and collect wastewater in a sedimentation/retention pond. ▪ Waste must not be disposed of into any surface water body.	CC, SC
5	Solid, Construction Waste, and	To minimize the solid, construction, and hazardous waste	▪ Wastewater effluent from the contractor's workshop and equipment washing yards would be passed through gravel/ sand beds to remove oil/ grease	CC, SC, PIU

	Hazardous Waste		contaminants before discharging it into natural streams. ▪ Training of the working force in the storage and handling of materials and chemicals that can potentially cause soil contamination. ▪ Solid waste generated during construction and camp sites will be safely disposed of in demarcated waste disposal sites, and the contractor will provide a proper waste management plan. ▪ The demolished waste of the building will be taken by the party that wins the auction of the demolished building. ▪ Burning of waste will be prohibited. ▪ Proper labelling of containers, including the identification and quantity of the contents, hazard contact information, etc. ▪ Training employees involved in the transportation of hazardous material regarding emergency procedures. ▪ Providing the necessary means for emergency response on call 24 hours/day. ▪ 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. ▪ Covering material during heavy rainfall. ▪ Locating stockpiles to minimize potential visual impact. ▪ Minimizing the land intake of stockpile areas as far as possible.	
6.	Removal of Asbestos causing health risks due to fibers of Asbestos contaminating air, soil, and water. Lung's cancer and mesothelioma are known risks.	To protect humans from health risks and to prevent fiber release and contamination.	Once it is established that Asbestos material is present in the underground wastewater pipes of the old building to be demolished, the following measures will be ensured: ▪ A licensed and Qualified firm will be engaged to identify and plan for safe management, storage, and disposal of asbestos-containing materials. ▪ Use of specific PPEs will be ensured at the time of removal, storage, and disposal. ▪ Apply a wetting agent (Water, etc) to reduce fiber release during removal and storage process.	PIU, CC, SC

			▪ Asbestos-containing materials will be stored in closed containers away from direct sunlight, wind and rain. ▪ Limiting access to waste storage areas to 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. ▪ Safe disposal of the containers. ▪ Area, equipment, and PPEs will be decontaminated.	
7	Health and safety of workers and associated communities	To minimize health risks	▪ Obligatory insurance against accidents for laborers/workers shall be ensured; ▪ Basic medical training shall be imparted to specified work staff, and basic medical service and supplies to workers shall be made available at the site. ▪ The contractor will prepare layout plans for three campsites, indicating safety measures taken by the contractor, e.g., firefighting equipment, safe storage of hazardous material, first aid, security, fencing, and contingency measures in case of accidents; ▪ Work safety measures and good workmanship practices are to be followed by the contractor to ensure no health risks for laborers. ▪ 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., helmet, adequate footwear for bituminous pavement works, protective goggles, and gloves, etc. ▪ Ensure strict use of protective clothing during work activities; ▪ Emergency number shall be placed at worksites; ▪ Elaboration of contingency planning in case of major accidents;	CC, SC

			▪ Instruct the construction supervisor to strictly enforce the keeping out of non-working persons, visitors, particularly children, off work sites; and ▪ Adequate signage, lightning devices, barriers, yellow tape, and persons with flags during construction to manage traffic at construction sites, haulage, and access roads. ▪ There should be proper control on construction activities and oil spillage leakage from vehicles. ▪ Efforts will be made to create awareness about road safety among the drivers operating construction vehicles. ▪ Timely public notification on planned construction works. ▪ Provide proper safety and diversion signage, particularly at sensitive/accident-prone spots. ▪ Setting up speed limits in close consultation with the local stakeholders. ▪ The labor staff with any transmissible diseases should be restricted to the construction site. ▪ 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, and providing health services; and ▪ Reducing the impacts of vector borne diseases on long-term health effect of workers should be accomplished through implementation of diverse interventions aimed at eliminating the factors that lead to disease, which includes 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). ▪ Prohibition of entry for the local community/any unauthorized persons at work sites. ▪ Proper hygiene practices in the toilets and washrooms will be implemented with proper and adequate use of soaps and disinfectant spray.	
8	Labor Camp Site	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 camps' presence does not cause any concerns for the nearby community.	▪ The contractor will prepare and submit a laborer camp management plan for each of the three subproject sites and submit it to PIU for approval. ▪ All the workers staying in the camp will be issued ID cards for security purposes. ▪ All required first aid and emergency medical health facilities will be provided in the camp. ▪ The camps will be properly fenced and gated to prevent the entry of outsiders into the camp. ▪ Entry for the local community/any unauthorized persons at the campsite will be prohibited. ▪ Preparation of Waste Management Plan addressing the classification, storage, and disposal of all solid wastes and the training of employees for handling the hazardous materials. ▪ Training will be provided to all staff members on camp management rules and overall discipline, and cultural awareness.	
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. ▪ There are chances that 2 or 3 trees to be cut down that come in the proposed Tehsil Complex building. Each of the cut trees will be replaced with 10 trees of the same species in the available land. ▪ 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.	CC, SC

			▪ 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 off to prevent the chances of being eaten by animals, which may become hazardous to them; ▪ Special measures will be adopted to minimize impacts on the birds, such as avoiding noise-generating activities during critical periods of breeding. ▪ Staff working on the project should be given clear orders not to shoot, snare, or trap any bird.	
10	Traffic Management	To minimize traffic problems in the project area	▪ A proper traffic management plan will be prepared and implemented to avoid traffic jams/public inconvenience. ▪ Movement of vehicles carrying construction materials should be restricted during the daytime to reduce traffic load and inconvenience to the residents. ▪ The executing agency must maintain liaison between the residents/visitors, travelers, and the contractor to facilitate traffic movement during the construction stage.	CC, SC, and PIU
14	Communicable diseases	To minimize the spread of Communicable diseases	A communicable disease prevention program will be prepared for construction workers or residents near the construction sites. ▪ Employees showing symptoms such as fever or high body temperature, coughing, difficulty breathing, or chest pain will be sent to a clinic or the nearest hospital immediately. ▪ Awareness and implementation of the Quarantine Procedure for all employees who have come back from vacation. ▪ Ensure Disinfection of offices and machinery periodically. ▪ Provision of face masks, instruction boards, and signage at different locations for health hazards awareness.	CC
Operational Phase				
1	Natural Hazard	To minimize the risk of structural collapse and flooding in the District, Tehsil, and residence complexes.	▪ Ensure that the new structures can withstand earthquake impacts. ▪ Inspections should be conducted at appropriate intervals by qualified personnel to ensure the integrity of structures, and	PIU

			▪ Develop an emergency response plan for the rainwater flooding in the sup project site.	
2	Waste	To minimize and store the solid waste	▪ A proper waste management system, including provision of waste bins, regular sweeping, and collection of waste, will be adopted during the operational phase.	PIU
3	Drainage	To prevent flooding and pooling	▪ Routine inspection and maintenance of the drainage system shall be scheduled and implemented.	PIU
4	Flora	To maintain flora in the Tehsil complex	▪ Routine 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. ▪ 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. ▪ Use of fertilizers in open spaces should be strictly monitored to avoid any incident. ▪ Natural nutrients should be preferred.	PIU

Environmental Monitoring is undertaken during both the construction and operational phases to ensure the effectiveness of the proposed mitigation measures. Certain environmental parameters are selected, and quantitative & qualitative analyses 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 needs further instruments to bring the parameters in accordance of set guideline values.

Parameters to be analyzed during pre-construction, construction & operation of the project, responsibilities for monitoring have been discussed and provided in Tables 4 to 6 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 baseline air quality levels	CO, NO_2, SO_2, O_3 $PM_{2.5}$ & PM_{10} (particulate matter smaller than 10 microns) concentration at	1-hr and 24-hr concentration levels	At three random receptor locations in each of the three subproject areas	Once	CC

		the receptor level				
Ambient Noise	To establish baseline 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 each of the three subproject areas	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 three random receptor locations in each of the three subproject areas	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 three random receptor locations in each of the three subproject areas	Quarterly basis on a typical working day	Contractor's Environmental Engineer (CEE), 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_{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 each of the three subproject areas	Quarterly basis on a typical working day	Contractor's Environmental Engineer (CEE), 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.	Construction site of each three subproject sites 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 Engineer (CEE), 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 three random receptor locations in each of the three	Quarterly	Contractor's Environmental Engineer (CEE), SC

				subproject areas		
Safety precautions by workers	To prevent accidents for workers and the general public	Number of near-miss events and accidents taking place	Visual inspections	Construction sites of all three subprojects	Once Daily	Contractor's Environmental Engineer (CEE), SC
Soil Contamination	To prevent contamination of soil from oil and toxic chemical spills and leakages	Incidents of oil and toxic chemical spills	Visual inspections	Construction sites and vehicle and machinery refuelling & maintenance areas of all subproject sites	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 three subproject areas	Visual inspections	At work sites in each of the three subproject areas	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 all three subprojects 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	All three subproject Complex premises	Bi-Annual	PIU, Tehsil Administration

6.2 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 PMU 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 PMU, 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.

6.3 Capacity Building and Training

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

The contractor's environmental awareness and appropriate knowledge of environmental protection is critical to the successful implementation of the EMP, as without appropriate environmental awareness, knowledge, and

skills required for the implementation of the mitigation measures, it would be difficult for the contractor's workforce to implement effective environmental protection measures. A suitable training program is proposed to train the Contractor's staff who will be involved in the Construction Phase and the professional staff from the client involved at the operational stage of the project. The details of this training program are presented in **Table 8.**

Table 8: Personnel Training Program

Provided by	Contents	Trainees/Events	Duration
Consultants/ organizations Specializing in environmental management and monitoring	Training sessions on: Environmental laws and regulations, daily monitoring and supervision (At each subproject Site)	Two training sessions, one For PIU staff and one for Contractor project staff	2 Days
Consultants/ organizations specializing in Occupational health and Safety	Training session relating to Occupational Safety and Health, GBV, SEA and SH , awareness and its related protective measures., (At each subproject Site)	One session for contractor's staff	1 Day
Consultants/ organizations specializing in Grievances Redressal Mechanism	Training session on what is GRM, how it's working, and who to be approached for redressal of complaint.	One session for the Surrounding community.	1 Day

6.4 Institutional Arrangements and Roles

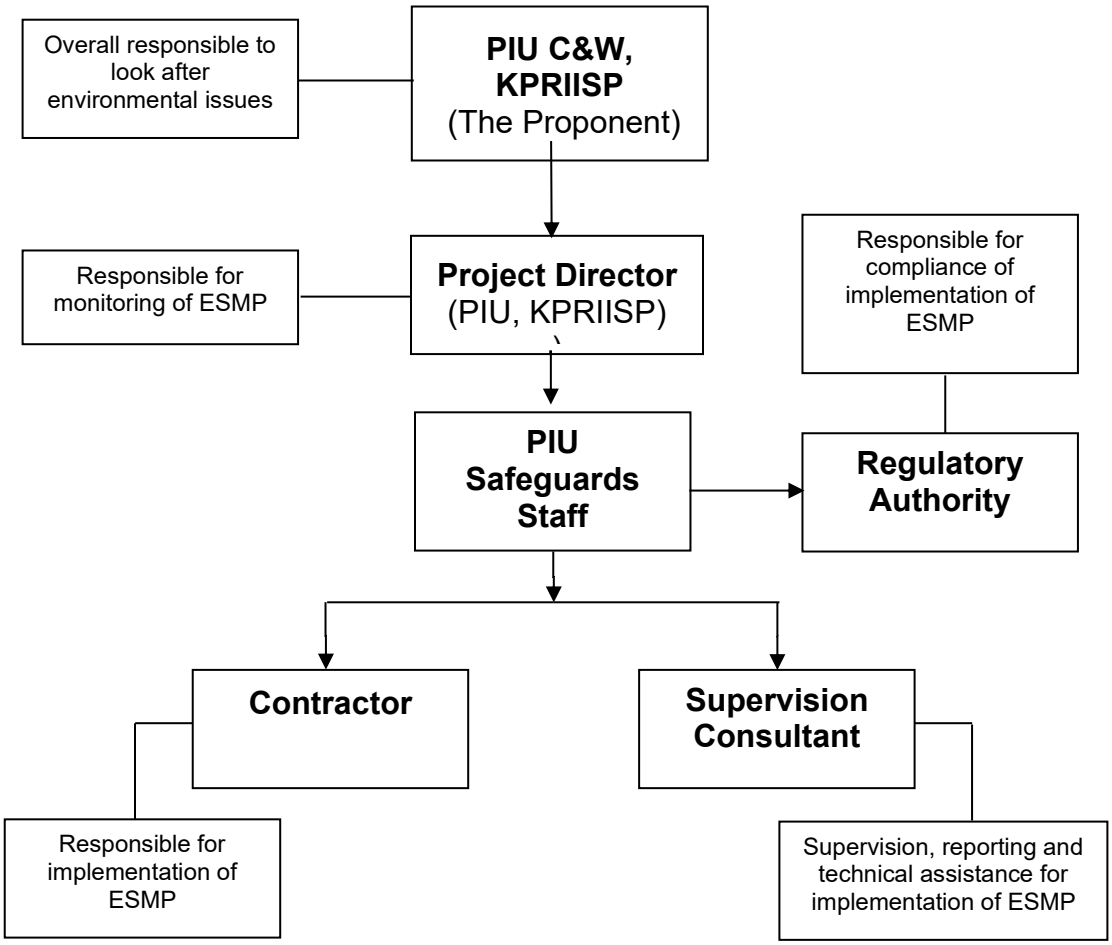
The main purpose of the ESMP is to provide a strategy for environmental protection. According to ESMP, all the activities associated with the project will be controlled and monitored during the design, construction, and operation phases. EMP will propose a plan of action that will indicate responsibilities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

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.

6.4.1 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 and carry out Environmental Implementation Plans for all three subprojects that are consistent with the ESMP;

6.4.2 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 the compliance of various statutory and legislative requirements. The EE will maintain close coordination with the Contractor and PIU for successful implementation with 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 environmental 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.

6.4.3 Responsibilities of the Site 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 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.

6.5 Labor Camps Management

Campsites at each subproject site will be selected in consultation with the District and Tehsil Administration, PIU C&W at a suitable location once the contractor (s) is/are mobilized on site on an adequate area for establishing camp site, 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. It is anticipated that around 30-40 laborers will be present at each camp during the construction phase of these subprojects. 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 are shown in Annex 6, in the site plans of each subproject's site. However, the Contractor's ESMP (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.

6.6 Occupational Health and Safety

Occupational Health and Safety (OH&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 OHS risks and ensure the safety of the laborers at each subproject site. 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.

6.7 GBV/SEA/SH Risk Mitigation

To mitigate potential 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.

6.8 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 6 to 9 below provide the respective monitoring to be conducted during the three project development phases: the Pre-Construction Phase, Construction, and Operation Phases. The ESMP implementation budget is for three subproject sites, including the District Office, the Tehsil Office, and the Residence complexes.

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_{10}	9 (1 time at 5 locations) 3 readings at each subproject site	270,000	9 readings @ PKR 30,000 per sample
Noise Levels	dB(A)	9 (1 time at 5 locations) 3 readings at each subproject site	270,000	9 readings @ PKR 30,000 per reading
Ground Water Quality	NEQS	9 (1 time at 5 locations) 3 readings at each subproject site	270,000	9 readings @ PKR 30,000 per sample
Contingencies			81,000	10% of the monitoring cost
Total (PKR)			**891,000**	

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_{10}	36 (Quarterly basis at 3 locations) 12 readings at each subproject site	1,080,000	36 readings @ PKR 30,000 per sample
Noise Levels	dB(A)	36 (Quarterly basis at 3 locations) 12 readings at each subproject site	1,080,000	36 readings @ PKR 30,000 per reading

Ground Water Quality	NEQS	24 (Quarterly basis at 2 locations) 8 readings at each subproject site	720,000	24 readings @ PKR 30,000 per sample
Contingencies			288,000	10 % of the monitoring cost
Total (PKR)			**3,168,000**	

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

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Waste Management	Solid Waste	Quarterly (4 times at each subproject site)	600,000	12 times @ PKR 50,000
Total (PKR)			**600,000**	

Table 12: Cost Estimate 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/ transportation of hazardous material	Rs. 30,000/month for 12 months will be required for the transportation of material	360,000
Handling of hazardous waste and safe storage	Lump sum cost of the containers, marking, and safe storage before disposal	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. Also, including the cost of 3 dustbins to be placed at the construction site.	272,000
Cost of Personal Protective Equipment (PPE)*	For 30 employees for the provision of dust masks, safety shoes, gloves, a first aid box, ear plugs	1,056,000
Cost of environmental training	Lump sum	450,000
Disease Management Cost	Lump sum	400,000
Total		**3,261,000**
Grand Total for three Subproject Sites (3,261,000 x 3)		**9,783,000**

*The details of the PPE are provided in Table 10.

Table 13: Break-up for PPEs

Items	Quantity	Cost / Item (Rs.)	Total Cost (Rs.)
Personal Protective Equipment (PPE)			
Dust masks	3000	20	60,000
Safety Shoes	240	2000	480,000
Gloves	1200	300	240,000
Safety Helmet	240	900	216,000
First Aid Box	3	8000	24,000
Ear Plugs	1200	30	36,000
		Total for one subproject site	**1,056,000**
Time required for Construction = 36 months			
Number of laborers required during construction = 30			
Details of Personal Protective Equipment PPE			
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		
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		
Total cost for three subproject Sites (1,056,000 X 3) = 3,168,000/-			

Serial No.	Activity	Cost in PKR
1.	Cost Estimate for 'Pre-Construction Phase' Environmental Monitoring	891,000 /-
2.	Cost Estimate for 'Construction Phase' Environmental Monitoring	3,168,000/-
3.	Cost Estimate for 'Operation Phase' Environmental Monitoring	600,000/-
4.	Cost Estimate for Environmental Mitigation Cost	9,783,000/-
5.	Cost Estimate and Break-up of PPEs	3,168,000/-
6.	Cost Estimate for Environmental Engineer, with intermittent input of 18-man months @ PKR 150,000/ per month.	2,700,000/-
7.	Cost of Asbestos material screening, storage, and management including transportation and disposal at the Tehsil Complex Site.	1,500,000
	Total	**21,810,000/-**

Table 14: Total Cost for ESMP Implementation for three subproject sites

6.9 Reporting Requirements

6.9.1. 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. 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:

Supervisory Authority: Responsible for regular monitoring of the ESMP results and mitigation measures.

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

6.9.2. 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, time taken	Grievance Redress Mechanism focal point

6.9.3. 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. The key stakeholders with whom the reports are to be shared are as follows:

- **Disclosure**: Reports must be shared with relevant stakeholders, including:
    - Residents of the area
    - Tehsil Administration and Local Government
    - Environmental Protection Agency (EPA), KP

- **Public Consultation Records**: Must be maintained and included in periodic reports.

6.9.4. Emergency and Contingency Reporting

In addition to regular ESMP monitoring and reporting, additional reports must be prepared and submitted in the event of emergencies. 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 THEKHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT

NOTIFICATION

Dated Peshawar the, 02nd September, 2021

No. SO (Envt)/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.

1

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		Land Requirement	
	Is basic sites data available, or has it been measured?	(Only tick yes if the data is reported in the EIA/IEE/GEA)		
			Available	Measured
8		Meteorology (including rainfall)	Yes/No	Yes/No
		Ambient air quality	Yes/No	Yes/No
		Ambient Water Quality	Yes/No	Yes/No
		Ground Water quality	Yes/No	Yes/No
			Measured	Reported
9	Have estimates of the following been reported	Water balance	Yes/No	Yes/No
		Solid waste disposal	Yes/No	Yes/No
		Liquid waste treatment	Yes/No	Yes/No
10	Source of power		Power Requirement	
11	Labour force (number)	Construction: Operation:		

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

Date_____

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

SCHEDULE-IX
(see rule 13)

Decision on GEA

1. Name and address of proponent _____

2. Description of project _____

3. Location of project and GPS Coordinates/GIS map._____

4. Date of filing of GEA _____

5. After careful review of the GEA, and all comments thereon, the Agency has decided

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

or

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

_____

_____

or

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

_____

_____

or

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

_____

_____

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

Dated _____ Tracking no.___

Director-General Agency (with official stamp/seal)

SO (Envt)/FE&WD/1-29/2021/Vol-II/ **Dated 02-09-2021**

Copy forwarded to the:

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

(Muhammad Qasim)
Section Officer (Environment)

Annex 2. Environmental and Social (E&S) Screening Form

i) E&S Screening Checklist of District Complex Khar Bajaur

Khyber Pakhtunkhwa Rural Investment and Institutional Support Project

Environmental and Social Screening Checklist

For
District Office Complex, Bajaur

May 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 District Complex site
3. Land Coordinates of the District Complex site.
4. Master Plan of proposed District Complex
5. Stakeholder Consultation

Subproject: District Office Complex, 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: April 17, 2025.

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

1. Subproject Information:

Subproject Title	District Office Complex Bajaur
Subproject Location	The proposed new District Office building complex in Bajaur District is located within the existing Government Colony in Tehsil Khar. The site is approximately 1 km from the main Khar Bazaar in Bajaur. The Government Colony site in Tehsil Khar has been owned by the respective District Government for more than 50 years.
PIU in Charge	Communications &Works (C&W).
Estimated Cost	Not known at this time. Will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new District Office Building Complex site is on a vacant piece of land spread over an area of 13 kanals. The new District Complex building is a multistoried, ground-plus three-storied building with a basement. The multistory building provides Offices with allied facilities for the District Administration staff and visiting general public. The proposed new building will include Offices, public waiting areas (for both male and female visitors), public washrooms (for both males and females), kitchens on each floor, and circulation areas for easy access and circulation of officials and the public. Also, around the multistoried building block and along the access road, green areas with plantation will be developed to increase the plantation and aesthetics of the proposed complex.

2. Environmental and Social Screening Questionnaires

Questions	Answer		Remarks
	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 construction of community bridges, which may propose moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project activities in your project and separate those that may be low risk and those that may be moderate risk. 2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads with ramps, elevators and tactile paths to accommodate persons with disabilities and the elderly), community centers, schools, bridges and jetties?	Yes		The proposed subproject involves the new construction of office buildings for the District Administration.
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 new complex will involve the new construction of office buildings having all the allied facilities for the offices.
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. 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 compound of Government office cum residential area and will not lead to any risks or negative impacts on individual groups or communities.
ESS2: Labor and Working Conditions			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		No	The construction works will be contracted out to approved Government contractors through an open bidding process. Government-approved contractors are those that fully abide by the existing labor laws of the country that

[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.

			prohibit child and forced labor. Identity Cards of Labor will be checked during regular supervision visits.
7. Does the subproject involve recruitment of a workforce including direct, contracted, primary supply, and/or community workers?	Yes		The contractor will recruit contracted labor (preference will be for local hiring). Relevant provisions of the LMP will be excerpted into the proposed ESMP and implemented.
8. Will the workers be exposed to workplace hazards that need to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?	Yes		There are chances that the workers during construction activities are exposed to workplace hazards like dust, loud noise, and other hazards. These will be managed by the local regulations of labor and EHSGs, and required PPE will be provided by the contractor to the workers.
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. The process of handling and safely disposing of both liquid and solid waste be strictly monitored by the construction supervision consultants and the implementation agency to ensure it does not adversely impact the surrounding environment and the nearby communities.
11. Whether the subproject construction will use any community resources(water, sand, and gravel) and whether there is a risk of depleting these resources.	Yes		On the subproject site for construction activities, the water requirement will be met through a temporary arrangement from the existing water supply network of colony. For sand and gravel, the existing licensed borrow pits in the nearby vicinity. All the resources 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 on regular basis 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 site is located on a plot within a compound of Offices and residential buildings. There are likely chances of old water supply and sewage pipelines of Asbestos pipes. The old building drawings record showing the water supply and sewage pipes are not available at site to determine the existence and location of such pipes at the site. However, during the construction, if 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 mitigation and protective measures to be

			adopted in the removal, storage and disposal of Asbestos pipes.
13. Are works likely to cause significant negative impacts to air and / or water quality?	Yes		During the construction of buildings, chances exist for a moderate level of negative impact on the ambient air quality and underground water quality of the site and its immediate surrounding areas. Before the start of construction ambient air quality and underground water tests will be conducted to establish the baseline. In the proposed ESMP a set of protective and mitigation measures, for example, to avoid dust particulate matter entry in air, regular water spraying of the area is 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 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 situation will be done with the residents for their understanding and avoiding such risks.
14. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?		No	The proposed site of the subproject is a vacant piece of land and has no existing infrastructure or discharge points for wastewater. Therefore, for the proposed complex, 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 water.
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	Since the construction workers' camp will be established within the construction site, and mostly the workers will be confined to their construction and campsite, the risk of communicable diseases spreading outside this area will remain low. To protect the traffic-related accidents during the construction process, vehicular movement related to the construction activities will be managed through a traffic management plan (to be provided in ESMP) and will be limited to specified timings to avoid rush hours at the site
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 20-25 construction workers will be present at the labor camp. The site of the labor camp will be provided in the proposed ESMP, and additional mitigation measures will be provided once the

			location of the camp is finalized. The mitigation measures will be provided in the ESMP. In the cases of accidents and other emergencies, they will use the existing health facility present in the area. For water supply and electricity, the contractor will be making his own arrangements to provide such services to their workers.
18. Is there a risk that SEA/SH(Sexual Exploitation and Abuse, and Sexual Harassment)) may increase as a result of project works?	Yes		Although the worker's campsite will include supervisory staff to protect against such incidents, a risk does exist. The project will follow the Labor Management Procedures prepared under ESS2 and the GBV/SEA Mitigation Plan prepared under ESS4 and ensure Contractor and labor sign the GBV/SEA/SH Code of Conduct and are provided training and awareness on this issue to assist in preventing any GBV incidents. The Occupational Health and Safety (OHS) measures and mitigation steps will be included in the proposed ESMP" to ensure worker wellbeing and minimize risks to the host community.
19. Would any public facilities, such as schools, health clinics, or places of worship be negatively affected by construction?	Yes		There is a school in close vicinity of the proposed complex. At the time of construction, special measures will be adopted to not disturb the education process and ensure the safety of the students. Steps ensuring the safety of students (like not allowing labor access to the school area and vice versa, fencing (or gating) the construction area to ensure no intrusion, installing signage warning against trespassing into school, etc). In addition, measures like not using noise-producing machinery and equipment during school timings, and all loading and unloading of construction material will not be allowed at school timings.
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. In the ESMP, a chapter on "Security Risks Assessment and Mitigation" will be included in line with the KPRIISP Security Management Plan.
21. Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war?		No	The proposed subproject site has been a declared official Offices cum residential area for the last 50 years and is habited by the Government Officials of former Bajaur Agency, and now by the District Administration. Therefore, the site is not in any war zone.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
22. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?		No	The proposed subproject site's land is owned by the District Administration and is Government Land, so no involuntary acquisition of new land will be required.
23. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?		No	The proposed subproject site is vacant land, so there will be no temporary or permanent physical displacement of any community, group or individual will take place.
24. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?		No	As mentioned above the subproject site is vacant land with no temporary or permanent physical displacement taking place; therefore

			no chance of economic displacement of any community, group, or individual.
25. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?		No	The proposed subproject site land has been owned by the Government for more than 50 years and has established the official Government Colony compound for the former Bajaur Agency here.
26. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?		No	The existing compound already has these facilities, and therefore, the proposed Office Complex will use these existing services. However, some improvement and rehabilitation of existing services will be done, but no new land acquisition will be required.
27. Is private land required for the subproject activity being voluntarily donated to the project?		No	No private land acquisition is involved, whether voluntary or involuntary, as the Government owns the proposed subproject site.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
28. Does the subproject involve activities that have the potential to cause any significant loss or degradation of critical habitats[2] whether directly or indirectly, or which would lead to adverse impacts on natural habitats[3]?		No	The proposed subproject site is not situated in or near any critical and natural habitats, therefore, it would not have any adverse impacts on them.
29. Will the project involve the conversion or degradation of non-critical natural habitats?		No	The proposed subproject will involve the construction of an office building complex within a defined area.
30. Will this activity require the clearance of trees, including inland natural vegetation?		No	The proposed subproject complex will be built on a vacant piece of land having no trees at the site. However, on roadsides and in the surrounding areas of the site, Olive trees are present. In the design of the complex, all existing trees are protected, and during the construction process, all efforts will be made to protect, conserve, and preserve the existing trees that are present around the subproject site.
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 stated above, the subproject site is a vacant piece of land. The existing trees and natural vegetation in the surrounding areas will be protected and conserved, therefore not disturbing the existing ecosystem of the area.
ESS7: Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities			
32. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?		No	At the site and even in the entire central part of Khyber Pakhtunkhwa, there are no Indigenous Peoples or Communities as per ESS7 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.

[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)."

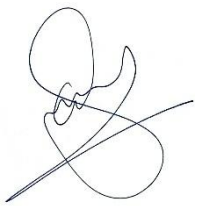
[3] Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

ESS10: Stakeholder Engagement and Information Disclosure			
35. Is Stakeholder Engagement Carried out, and what are the stakeholders' views about the subproject?	Yes		A summary of the stakeholder engagement is presented below: The stakeholders said, since the site is Government-owned land and no land acquisition or resettlement is required, therefore construction and development process of the complex will be easy and simple. In-charge Revenue and Estate confirmed the site is free from any legal issues, reducing potential risks. The stakeholders viewed the site of the District Complex as very accessible, as it is just near the main Bazar area. They also think it is safest for women and children due to its location inside the guarded compound. They suggested additional measures to enhance accessibility, safety, and inclusivity for diverse users, particularly women, vulnerable groups, and elderly people, like Ramps with handrails for special and elderly persons, especially designed washing rooms for special and elderly persons, separate waiting areas and washrooms for women to respect local culture and traditions, and dedicated desks for women to raise grievances and access public services in a secure environment. They welcomed the planned additional plantation and new waste management system, and termed it environmentally responsible development.

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: 28/05/2025**	 **Approved By:** **Position: Project Director, C&W PIU**

ii) E&S Screening Checklist of Tehsil Complex Khar Bajaur

Khyber Pakhtunkhwa Rural Investment and Institutional Support Project

Environmental and Social Screening Checklist For

Tehsil Office Complex Khar, District Bajaur

May, 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 Complex site
3. Land Coordinates of the Tehsil Complex site.
4. Master Plan of proposed Tehsil Complex
5. Stakeholder Consultation

Subproject: **Tehsil Office Complex, Khar 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: April 25, 2025.

The E&S Screening procedure comprises of two stages-process: (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 Office Complex Khar, Bajaur
Subproject Location	The proposed new Tehsil Office Building complex in Tehsil Khar, Bajaur District, is located within the existing Government Colony in Tehsil Khar. The site is approximately 1 km from the main Khar Bazaar in Bajaur. The Government Colony site in Tehsil Khar has been owned by the respective District Government for more than 50 years.
PIU in Charge	Communications & Works (C&W).
Estimated Cost	Not known at this time. Will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new Tehsil Office Building Complex's site is spread over an area of 08 Kanals. The site has a building that is in use by the Administration. This building will be demolished to create space for the new complex requirements. The subproject will provide Offices, allied facilities, and basic service areas for the Tehsil Administration staff. The building includes Offices, meeting rooms, conference halls, waiting areas for the public (both for male and female visitors), public washrooms (both for males and females), kitchens on each floor, lift facility, service and circulation areas for easy access and circulation of the officials and the public and car parking facilities for officials and visitors. The subproject also has the provision for landscaping of the available open spaces to increase the tree cover and greenery of the site.

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)	Yes		

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 construction of community bridges, which may propose 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 new construction or significant expansion of ponds, solid waste management systems, shelters, roads (including access roads with ramps, elevators and tactile paths to accommodate persons with disabilities and the elderly), community centers, schools, bridges and jetties?			The proposed subproject involves demolition of an existing structure and the construction of new office buildings for Tehsil Administration.
3. Does the subproject involve renovation or rehabilitation of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?		No	The proposed subproject involves the construction of new office buildings having all the allied facilities and services for the offices.
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. 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 compound of Government office cum residential area and will not lead to any risks or negative impacts on individual groups or communities.
ESS2: Labor and Working Conditions			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		No	The construction works will be contracted out to approved Government contractors through an open bidding process. Government-approved contractors are ones that fully abide by the existing labor laws of the country that prohibit child and forced labor. Identity Cards of Labor will be checked during regular supervision visits.
7. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?	Yes		The contractor will recruit the labor (preference will be for local hiring). Relevant provisions of the LMP will be excerpted into the proposed ESMP and implemented.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?	Yes		During the construction activities of buildings, there are chances for the workers to be exposed to workplace hazards like dust, very loud noise, and other hazards. These will be managed by the local regulations of labor and EHSGs and required PPE will be provided by the contractor to the workers.

[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.

9. Is there a risk that women may be underpaid when compared to men when working on the project construction?		No	Generally, in Khyber Pakhtunkhwa and particularly in the merged districts, no female workers in 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 construction of the building will generate solid and liquid waste, but it will be handled and safely disposed of regularly from the site. The process of handling and safely disposing of both liquid and solid waste should be strictly monitored by the construction supervision consultants and the implementation agency to ensure it does not adversely impact the surrounding environment and the nearby communities.
11. Whether the subproject construction will use any community resources (water, sand, and gravel) and whether there is a risk of depleting these resources.	Yes		For the construction at the subproject site, water requirements will be met through a temporary arrangement from the existing water supply network of the colony. For sand and gravel, the existing licensed borrow pits are in the nearby vicinity. All the resources 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 on regular basis 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 at PIU level is in a development stage and provides an opportunity for stakeholder to voice their potential concerns through GRM as well. it will be part of the ESMP as well.
12. Do any of the construction works involve the removal of asbestos or other hazardous materials?	Yes		The proposed complex site is located on a plot within a compound of Offices and residential buildings. There are likely chances of old water supply and sewage pipelines of Asbestos pipes. **The old building drawings record showing the water supply and sewage pipes is not available at** the **site 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. T**he proposed ESMP of the project will provide the required mitigation and protective measures to be adopted in the removal, storage and disposal of Asbestos pipes.**
13. Are works likely to cause significant negative impacts to air and / or water quality?	Yes		During the construction of buildings, chances exist for a moderate level of negative impact on the ambient air quality and underground water quality of the site and its immediate surrounding areas. Before the start of construction ambient air quality and underground water tests will be conducted to establish the baseline. In the proposed ESMP a set of protective and mitigation measures, for example, to avoid dust particulate matter entry in air, regular water spraying of the area is 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 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 situation will be done with the residents for their understanding and avoiding such risks.
14. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?		No	The proposed site of the subproject is a vacant piece of land and has no existing infrastructure or discharge points for wastewater. Therefore, for the proposed complex, 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 water. At the proposed site, there is one building that is to be

			demolished. The existing building has individual systems of septic tanks; its present capacity is only to serve the purpose of that particular building. Therefore, for the proposed complex, 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 water.
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 disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?	Yes		Since the construction workers' camp will be established within the construction site, and mostly the workers will be confined to their construction and campsite, the risk of communicable diseases spreading outside this area is low. To protect the traffic- related accidents during the construction process, vehicular movement related to the construction activities will be managed through a traffic management plan (to be provided in ESMP) and limited to specified timings to avoid rush hours at the site
17. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)	Yes		During the construction phase, around 22- 28 construction workers will be present at the labor camp. The site of the labor camp will be provided in the proposed ESMP, and additional mitigation measures will be provided once the location of the camp is finalized. The mitigation measures will be provided in the ESMP. In the cases of accidents and other emergencies, they will use the existing health facility present in the area. For water supply and electricity, the contractor will be making his own arrangements to provide such services to their workers.
18. Is there a risk that SEA/SH(Sexual Exploitation and Abuse, and sexual Harassment)) may increase as a result of project works?	Yes		Although the worker's campsite will include supervisory staff to protect against such incidents, a risk does exist. The project will follow the Labor Management Procedures prepared under ESS2 and the GBV/SEA Mitigation Plan prepared under ESS4 and ensure Contractor and labor sign the GBV/SEA/SH Code of Conduct and are provided training and awareness on this issue to assist in preventing any GBV incidents. The Occupational Health and Safety (OHS) measures and mitigation steps will be included in the proposed ESMP to ensure worker wellbeing and minimize risks to the host community.
19. Would any public facilities, such as schools, health clinic, places of worship be negatively affected by construction?		No	"*There is a Technical and Vocational Training College located nearby. However, it is situated outside the boundary wall with a separate access route. Therefore, no safety or accessibility concerns are anticipated*".

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. In the ESMP, a chapter on "Security Risks Assessment and Mitigation" will be included in line with the KPRIISP Security Management Plan.
21. Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war?		No	The proposed subproject site has been a declared official Offices cum residential area for the last 50 years and is habited by the Government Officials of former Bajaur Agency, and now by District Administration. Therefore, the site was not in any war 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 District Administration owns the proposed subproject site's land, and it 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	As the subproject site has an existing office building, the construction of new facilities will require the demolition of this existing building. The Tehsil Administration will be arranging the alternate office accommodation for their staff during the construction of the new offices.
24. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?		No	As the temporarily displaced people will be Government Officials, but their jobs are secured, and therefore their livelihood will not be disrupted by this temporary displacement.
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 more than 50 years and has established the official Government Colony compound for the former Bajaur Agency here.
26. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?		No	The existing Government Colony compound already had such facilities and these will be and these will be used by the newly built Office Complex. 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 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 and natural habitats, therefore, it would not have any adverse impacts on them.
29 Will the project involve the conversion or degradation of non-critical natural habitats?		No	The proposed subproject will involve the construction of an office building complex within a defined area.
30. Will this activity require clearance of trees, including inland natural vegetation?		No	The proposed subproject complex will be built on land that has a building and a vacant piece of land, but there are no trees at the site, and all efforts will be made to conserve and preserve the existing trees present around the subproject site
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 stated above, the subproject site has a large portion of vacant land, therefore, existing trees and natural vegetation in the surroundings will be conserved, thus not disturbing the existing ecosystem of the area.
ESS7: Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities			
32. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?		No	At the site and even in the entire central part of Khyber Pakhtunkhwa, there are no Indigenous Peoples or Communities as per ESS7 that are present.
ESS8: Cultural Heritage			

33. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?		No	In the near vicinity of the subproject site, there is no historical, archaeological, or culturally significant site or facility.
34. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?		No	No objects have spiritual values to local communities present within or near the subproject site.
ESS10: Stakeholder Engagement and Information Disclosure			
35. Is Stakeholder Engagement Carried out, and what are the stakeholders' views about the subproject?	Yes		A summary of the stakeholder engagement is presented below: The stakeholders said, since the site is Government-owned land therefore no land acquisition or resettlement is required. Therefore, the construction and development of the Tehsil complex will be a smooth process. In-charge Revenue and Estate confirmed the site is free from any legal issues, reducing potential risks. They further said the site of the Tehsil Complex is very accessible, as it is just near the main Bazar area and is safest for women and children due to its location inside the guarded compound. They suggested additional measures to enhance accessibility, safety, and inclusivity for diverse users, particularly women, vulnerable groups, and elderly people, like Ramps with handrails for special and elderly persons, especially designed washing rooms for special and elderly persons, separate waiting areas and washrooms for women to respect local culture and traditions, and dedicated desks for women to raise grievances and access public services in a secure environment. They welcomed the planned additional plantation and new waste management system, and termed it environmentally responsible development.

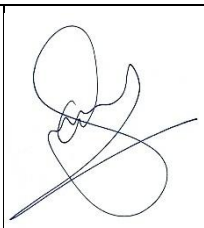
[2] Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national 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."

3. Conclusion

From the above screening checklist, it is evident that the potential environmental and social risks and impacts 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, efficient, and regular monitoring at the site following the Environment Management Plan for 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: 28/05/2025**	 **Approved By:** **Position: Project Director, C&W PIU**

iii) E&S Screening Checklist of Residential Complex Khar Bajaur

Khyber Pakhtunkhwa Rural Investment and Institutional Support Project

Environmental and Social Screening Checklist

For

District Residence Complex, Bajaur

May 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 District Complex site
3. Land Coordinates of the District Complex site.
4. Master Plan of proposed District Complex
5. Stakeholder Consultation

Subproject: **District Residence Complex, 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: April 22, 2025.

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

1. Subproject Information:

Subproject Title	District Residency Complex Bajaur
Subproject Location	The proposed new District Residence building complex in Bajaur District is located within the existing Government Colony in Tehsil Khar. The site is approximately 1 km from the main Khar Bazaar in Bajaur. The Government Colony site in Tehsil Khar has been owned by the respective District Government for around 50 years.
PIU in Charge	Communications & Works (C&W).
Estimated Cost	Not known at this time. Will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new District Residence Building Complex will be constructed on a vacant piece of land covering an area of 39 kanals. The proposed subproject complex will be a combination of houses and multi-story apartment buildings. The new Residence Complex will provide residences with allied facilities for the District Administration staff and their families. The building will include officers' houses, three two-storied and one three-storied apartment blocks, car parking areas for the residences, and circulation areas for easy access and circulation of the officials and their family members. To provide a healthy living environment for the officials and their family members, the proposed residency complex has the provision of two parks, Badminton and Basketball courts, a jogging track, and green open areas with a plantation to provide an oxygen hub for the residents.

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 plansor 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 construction of community bridges, which may propose moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project activities in your project and separate those that may be low risk and those that may be moderate risk. 2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads with ramps, elevators and tactile paths to accommodate persons with disabilities and the elderly), community centers, schools, bridges and jetties?	Yes		The proposed subproject involves the new construction of the Residency building complex for the District Administration.
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 involves the new construction of residency buildings having all the allied facilities and amenities for the residences of District Officials.
4. Will construction or renovation works require new borrow pits or quarries to be opened?		No	The construction materials like sand and aggregate will be brought from the existing licensed and approved borrow pits and quarries in the surrounding vicinity. Therefore, no new borrow pits or quarries for the construction materials will required. 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.[4]		No	The subproject site is already within a compound of Government office cum residential area and will not lead to any risks or negative impacts on individual groups or communities.
ESS2: Labor and Working Conditions			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		No	The construction works of the subproject 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 routine supervision visits.
7. Does the subproject involve recruitment of a workforce including direct, contracted, primary supply, and/or community workers?	Yes		The contractor of the subproject will recruit the workforce contracted labor (preference will be

[4] "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.

			for local labor). Relevant Provisions of the LMP will be excerpted into the proposed ESMP and implemented.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?	Yes		There are chances that the workers during construction activities are exposed to workplace hazards like dust, loud noise, and other hazards. These will be managed by the local regulations of labor and EHSGs, and the required PPE will be provided by the contractor to the workers.
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. The process of handling and safely disposing of both liquid and solid waste should be strictly monitored by the construction supervision consultants and the implementation agency to ensure it does not adversely impact the surrounding environment and the nearby communities.
11. Whether the subproject construction will use any community resources(water, sand, and gravel) and whether there is a risk of depleting these resources.	Yes		On the subproject site for construction activities the water requirement will be met through a temporary arrangement from existing water supply network of colony. For sand and gravel the existing licensed borrow pits in the nearby vicinity will be used. All the resources 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 on regular basis 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 provide an opportunity 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 site is located on a plot within a compound of Offices and residential buildings. There are likely chances of old water supply and sewage pipelines of Asbestos pipes. The old building drawings record showing the water supply and sewage pipes are not available at site to determine the existence and location of such pipes at the site. However, **d**uring the construction, once such pipes are found these will be carefully removed, properly stored, and safely disposed of to avoid any risks to workers and surrounding communities. The proposed ESMP of the project will provide the required mitigation and protective measures to be adopted in the removal, storage and disposal of Asbestos pipes.
13. Are works likely to cause significant negative impacts to air and / or water quality?	Yes		During the construction of buildings, chances exist for a moderate level of negative impact on the ambient air quality and underground water quality of the site and its immediate surrounding areas. Before the start of construction ambient air quality and

			underground water tests will be conducted to establish the baseline. In the proposed ESMP a set of protective and mitigation measures, for example, to avoid dust particulate matter entry in air, regular water spraying of the area is 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 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 situation will be done with the residents for their understanding and avoiding such risks.
14. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?		No	The proposed site of the subproject is a vacant piece of land and has no existing infrastructure or discharge points for wastewater. Therefore, for the proposed subproject a new separate system of septic tanks with soakage pits will be constructed to accommodate the future sewage follow and safe disposal of the treated water.
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 of the complex, "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	Since the construction workers' camp will be established within the construction site, and mostly the workers will be confined to their construction and campsite, the risk of communicable diseases spreading outside of this area will remain low. To prevent traffic-related accidents during the construction activities, a traffic management plan (to be provided in ESMP) will regulate vehicular movement, which will be managed and limited to specified timings to avoid rush hours at the site
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 of the subproject, around 20-25 construction workers will be present at the labor camp. The site of the labor camp will be identified in the proposed ESMP, and additional mitigation measures will be provided once the location of the camp is finalized. Therefore, some of the non-local construction workers will be present at the site. 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 its own arrangements to provide such services to its workers.
18. Is there a risk that SEA/SH(Sexual Exploitation and Abuse, and Sexual Harassment)) may increase as a result of project works?	Yes		Although the worker's campsite will include supervisory staff to protect against such

			incidents, a risk does exist. The project will follow the Labor Management Procedures prepared under ESS2 and the GBV/SEA Mitigation Plan prepared under ESS4 and ensure Contractor and labor sign the GBV/SEA/SH Code of Conduct and are provided training and awareness on this issue to assist in preventing any GBV incidents. The Occupational Health and Safety (OHS) measures and mitigation steps will be included in the proposed ESMP to ensure worker wellbeing and minimize risks to the host community.
19. Would any public facilities, such as schools, health clinics, or places of worship be negatively affected by construction?	Yes		There is a school in close vicinity of the proposed complex. At the time of construction, special measures will be adopted to ensure the safety of the students (like not allowing labor access to the school area and vice versa, fencing (or gating) the construction area to ensure no intrusion, installing signage warning against trespassing into the school, etc.). Measures like not using noise-producing machinery and equipment during school timings, and loading and unloading of construction material will not be allowed at school timings.
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. In the ESMP, a chapter on "Security Risks Assessment and Mitigation" will be included in line with the KPRIISP Security Management Plan.
21. Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war?		No	The proposed subproject site has been a declared official Offices cum residential area for the last 50 years and is habited by the Government Officials of the former Bajaur Agency, and now by the District Administration. Therefore, the proposed site is not in any active conflict zone.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
22. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?		No	The proposed subproject site's land is owned by the District Administration and is Government land, so no involuntary acquisition of new land will be required.
23. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?		No	The proposed subproject site is vacant land, so there will be no temporary or permanent physical displacement of any community, group, or individual will take place.
24. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?		No	As mentioned above, the subproject site is vacant land with no temporary or permanent physical displacement taking place; therefore, no chance of economic displacement of any community, group, or individual.
25. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?		No	The proposed subproject site land has been owned by the Government for more than 50 years and has established the official Government Colony compound for the former Bajaur Agency here.
26. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?		No	The existing Government compound already had such facilities and these and these will be used by the newly built Residential Complex. 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[5] whether directly or indirectly, or which would lead to adverse impacts on natural habitats[6]?		No	The proposed subproject site is not situated in or near any critical and natural habitats, therefore, it would not have any adverse impacts on them.
29. Will the project involve the conversion or degradation of non-critical natural habitats?		No	The proposed subproject will involve the construction of an office building complex within a defined area.
30. Will this activity require the clearance of trees, including inland natural vegetation?		No	The proposed subproject complex will be built on a vacant piece of land that has no trees at the site. However, there are trees present in the surrounding road and other spots, All efforts are made in the design of the complex to protect and preserve the existing trees in the surrounding areas. During the construction of the complex, efforts will also be made to protect, conserve, and preserve the existing trees present around the subproject site.
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 stated above, the subproject site is a vacant piece of land and efforts will be made to conserve and protect existing trees and natural vegetation in the surroundings of the site. Therefore, not disturb the existing ecosystem of the area.
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, no Indigenous Peoples or Communities as per ESS7 exist or 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	In the near vicinity of the subproject site, there is no historical, archaeological, or culturally significant site or facility.
34. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?		No	No objects have spiritual values to local communities present within or near the subproject site.
ESS10: Stakeholder Engagement and Information Disclosure			
35. Is Stakeholder Engagement Carried out, and what are the stakeholders' views about the subproject?	Yes		A summary of the stakeholder engagement is presented below: The stakeholders said, since the site is Government-owned land and no land acquisition or resettlement is required, therefore construction and development process of the complex will be easy and simple. In-charge Revenue and Estate confirmed the site is free from any legal issues, reducing potential risks. They were also of the view that the site of the District Residence Complex is a safe and secure one for women and children due to its location inside the guarded compound.

[5] 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)."

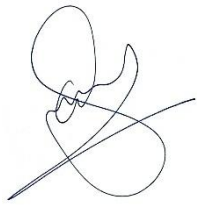
[6] Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

			They added that the location of the proposed residence complex site is not in a flash flood-prone area and welcomed the planned additional plantation and new waste management system, and said that due to these measures, it will be an environmentally friendly and responsible development.

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, efficient, and regular monitoring at the site following the Environment Management Plan of 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: 28/05/2025**	 **Approved By:** **Position: Project Director, C&W PIU**

Annex 3. Sample Monitoring Checklist

Project Name: _____
Location: Khar, 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			

Hazardous Waste – Asbestos from building/s demolition– is removed/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			

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

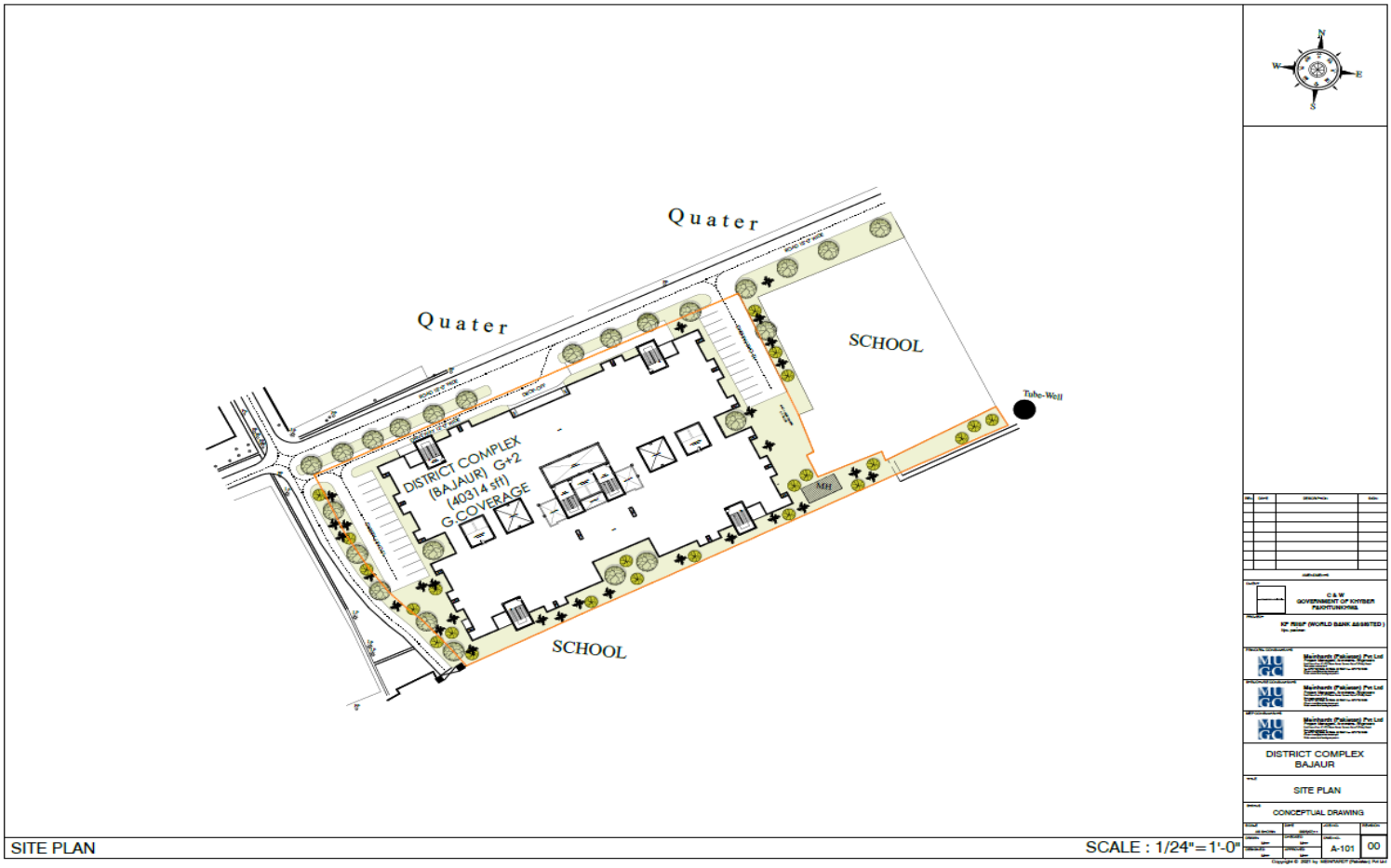
Details of Incident (e.g., to a worker or visitor) and Treatment		
Date of incident		
Time of incident		
Nature of incident	☐ Near miss ☐ First aid ☐ Medical treatment/doctor	
Name of injured person		
Address		
Occupation		
Date of birth		
Telephone		
Employer		
Activity in which the person was engaged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

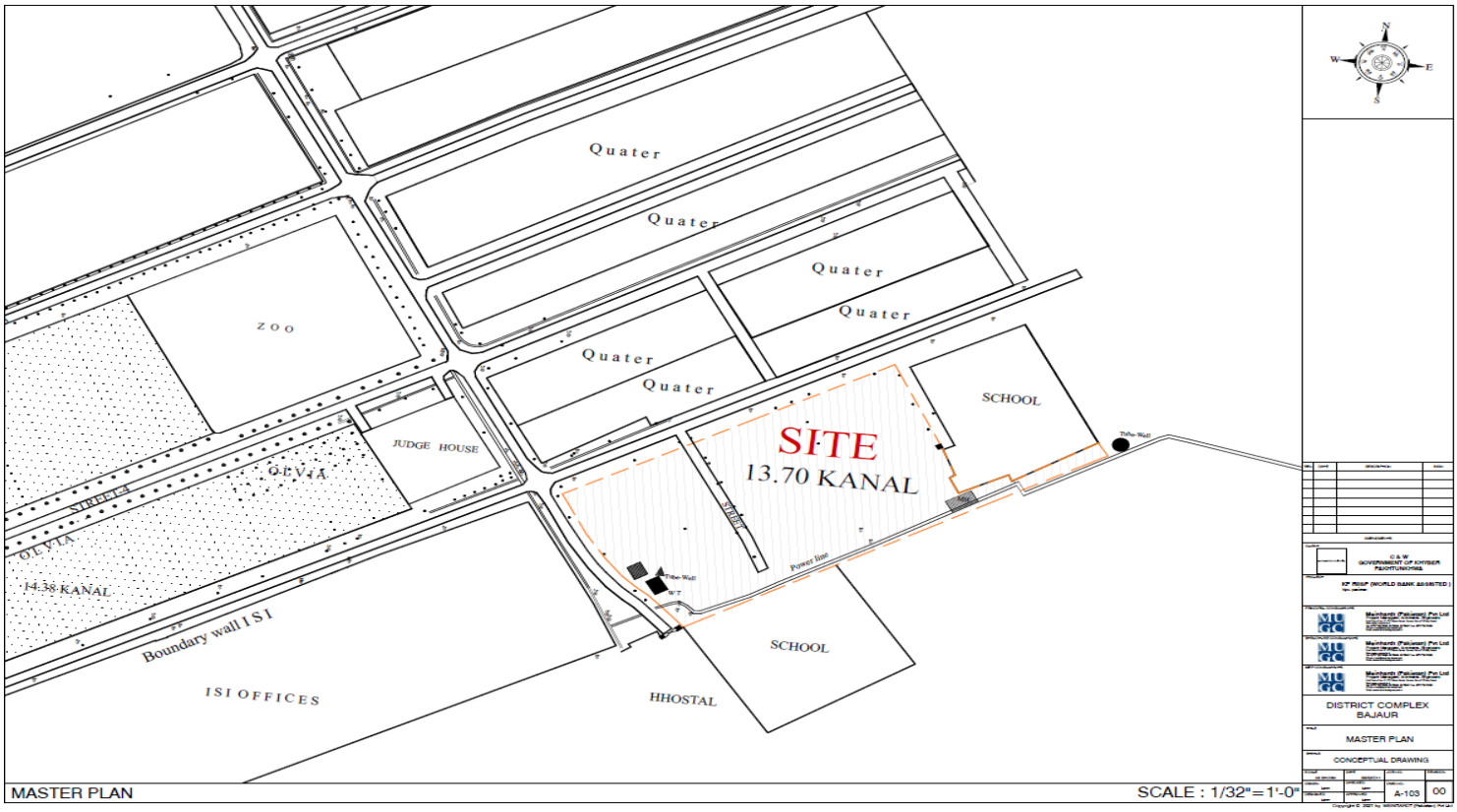
Witness to Incident (Include all witnesses)	
Witness name and contact	

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

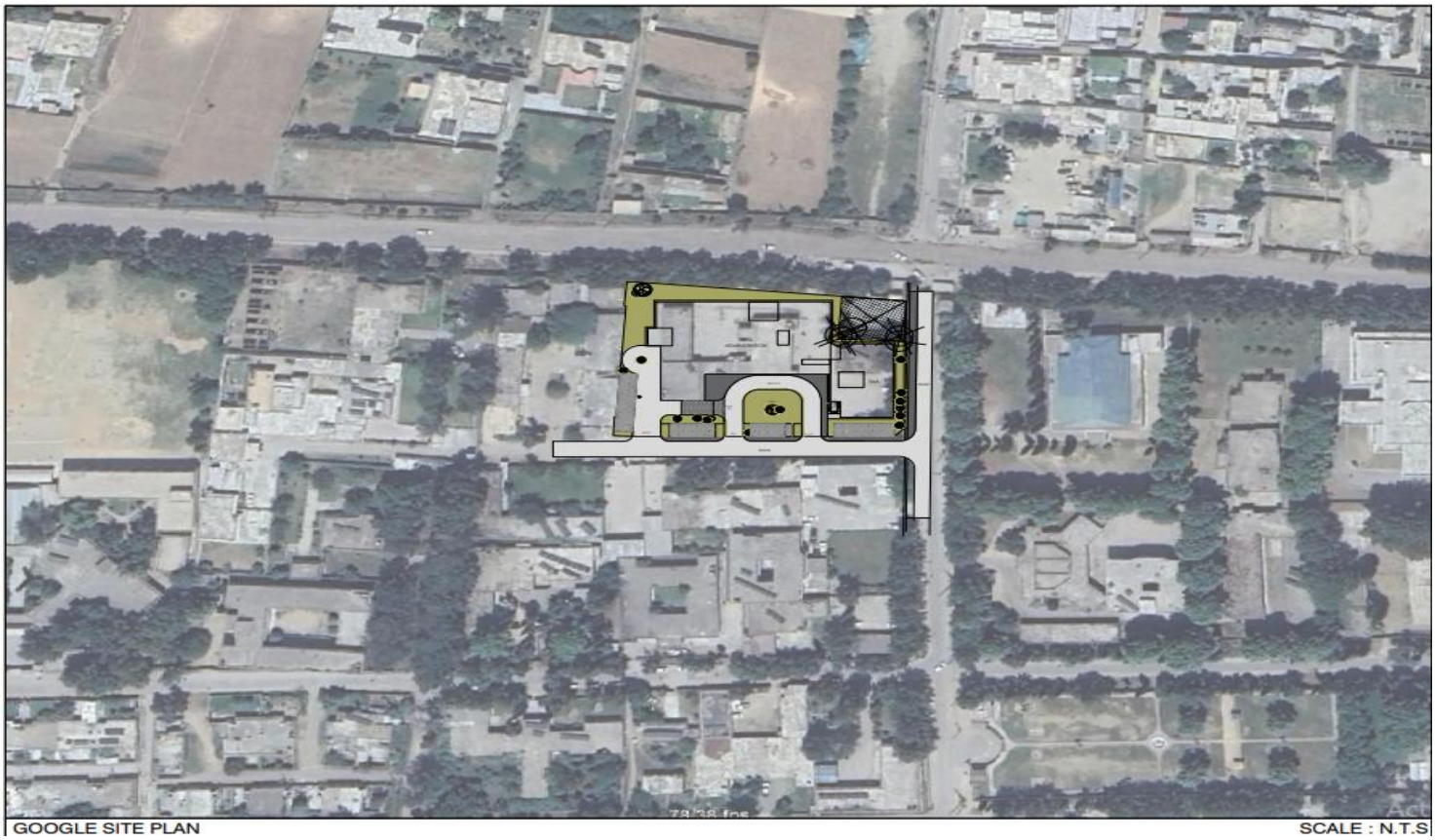
i) District Complex





MASTER PLAN SCALE : 1/32"=1'-0"

ii) Tehsil Complex



GOOGLE SITE PLAN SCALE : N.T.S

iii) Residential Complex

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

Stakeholder consultation plan at ADC office Bajaur. Representatives of line departments, community and district administration staff attended the meeting and shared their feedback.

Meinhardt team with DC District Bajaur

Representatives of line departments during consultation meeting

Meinhardt team visited the site to better understand the scenario. Sites for construction of district complex (right) and residential block(left) is visited.


Site for construction of new tehsil complex. Existing old building will be demolished.


Sites for construction of new district complex (left) and residential complex(right).


Sites for construction of district complex (left) and tehsil complex(right).

Annex 8: Air, Noise, Water quality baseline test reports

i) Water Quality Analysis, District Bajaur

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 µS/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 Usman[1], Shakeel Ahmad[2]*, Salah Uddin[3], Humaira Wasila[3] and Yasser Durrani[4] **Published** | October 28, 2023

Table 2: Selected microbial characteristics of the water samples evaluated for Total coliforms, Fecal 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)		0MPN/100ml	0MPN/100ml	-ive
US EPA limits (USEPA, 2009)		0MPN/100ml	0MPN/100ml	-ive
Pak EPA (Pak-EPA,2008)		0MPN/100ml	0MPN/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*
VOLUME 20 ISSUE 12 DECEMBER 2024

ii) Air Quality Analysis, District Bajaur on June 26, 2025

S No.	Parameters	Standard	Result
1	$PM_{2.5}$	50 µg/m³	152 61 µg/m³
2	PM_{10}	67 µg/m³	111 97 µg/m³
3	NO_2	44 µg/m³	51 27 µg/m³
4	O_3	98 µg/m³	46 95 µg/m³
5	SO_2	7 µg/m³	3 3 µg/m
6	CO	269 µg/m³	3 345 µg/m³

Source: ***https://www.accuweather.com/en/pk/khar/259112/air-quality-index/259112***

iii) Soil Quality Analysis in Khar Bajaur:

Overall, the pH level of the soil samples tested shows that the soil is slightly alkaline or neutral and therefore satisfactory for the plant's growth. The optimal Electrical Conductivity (EC) level in the soil ranges from 110-570 Deci Siemens per meter (dS/m). Too low EC levels indicate low available nutrients, and too high EC levels indicate an excess of nutrients and other salts /metals. Electrical Conductivity is at a minimum required range at three sample areas, while it remains at the normal 200 dS/m at some locations.

Soil organic matter (SOM) significantly improves the soil's capacity to store and supply essential nutrients (such as Nitrogen, Phosphorus, Potassium, Calcium, and Magnesium), and to retain toxic elements. It allows the soil to cope with changes in soil acidity and helps soil minerals decompose faster. The results indicate that the organic matter values are constant as samples were collected at a uniform depth. The samples/layers have 2-3% organic matter, which, although acceptable, may require some treatment for better agricultural growth.

As there is no system of irrigation from the surface water or runoff from any external source / industrial effluents, the pH value, EC, and SOM are in the acceptable range; and the land is free from any contamination and suitable for agriculture/horticulture purposes.

Source: Draft Master Plan Khar Urban Center June 2023

Annex 9: Coordinates of the Proposed Sites

i) District Complex

Site	Area	Coordinates
District Complex Khar, Bajaur	13 Kanal	E-3826570.7390 N-10054343.8451
District Complex Khar, Bajaur	13 Kanal	3826257.4212 10054146.6582
District Complex Khar, Bajaur	13 Kanal	3826395.0883 10053991.8091
District Complex Khar, Bajaur	13 Kanal	3826686.7400 10054181.8500
District Complex Khar, Bajaur	13 Kanal	3826650.5500 10054309.1900
District Complex Khar, Bajaur	13 Kanal	3826680.8100 10054291.2900

ii) Residential Complex

Site	Area	Coordinates
Residential Complex Khar, Bajaur	39 Kanal	E-3825545.8685 N-10053768.8436
Residential Complex Khar, Bajaur	39 Kanal	3825361.9076 10054079.8320
Residential Complex Khar, Bajaur	39 Kanal	3825460.9264 10053912.2884
Residential Complex Khar, Bajaur	39 Kanal	3825486.4805 10053869.2670
Residential Complex Khar, Bajaur	39 Kanal	3825799.8577 10054351.5016
Residential Complex Khar, Bajaur	39 Kanal	3825903.4180 10054187.1020
Residential Complex Khar, Bajaur	39 Kanal	3826041.8423 10054213.3275
Residential Complex Khar, Bajaur	39 Kanal	3826109.9893 10054112.5804

iii) Tehsil Complex

Site	Area	Coordinates
Tehsil Complex Khar, Bajaur	08 Kanal	3826538.6166 10055407.7429
Tehsil Complex Khar, Bajaur	08 Kanal	3826449.2112 10055578.6596
Tehsil Complex Khar, Bajaur	08 Kanal	3826630.0782 10055668.2554
Tehsil Complex Khar, Bajaur	08 Kanal	3826654.8876 10055620.6352
Tehsil Complex Khar, Bajaur	08 Kanal	3826709.3174 10055650.3395
Tehsil Complex Khar, Bajaur	08 Kanal	3826763.3752 10055543.8844

Annex 10: Participants' List of the Stakeholders' Consultation

- Mr. Adnan Mumtaz, Deputy Commissioner, District Bajaur, KP
- Mr. Haider, SDO Highways, District Bajaur, KP
- Mr. Sultan Zeb, SDO Buildings, District Bajaur, KP
- Mr. Subhan, Agriculture Officer, District Bajaur, KP
- Mr. Imran, Community Officer, Forest Division, District Bajaur, KP
- Mr. Ikram, Planning Officer, P&D District Bajaur, KP
- Mr. Ikram, Engineer, P&D District Bajaur, KP
- Noor ul Wahab, In-charge Revenue & Estate District Bajaur, KP
- Mr. Maaz, Engineer, District Bajaur, KP
- Mr. Bilal, Local Community Activist, District Bajaur
- Ms. Fozia, Deputy DO Education, District Bajaur, KP
- Ms. Uzma Gul, SDO Education, District Bajaur, KP
- Mr. Hanief Khan, Social Safeguard Specialist, Meinhardt / PIU C&W
- Ms. Saima Saeed, Gender Specialist, Meinhardt / PIU C&W

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