

# **Islamic Republic of Pakistan**

## **Sindh Flood Emergency Housing Reconstruction Project (SFEHRP)(P 180008)**

### **Environmental and Social Commitment Plan (ESCP)**

**November 22, 2022**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. Pakistan (the **Borrower**) will implement the Sindh Floods Housing Reconstruction Project (the **Project**) through the Province of Sindh (the Project Implementing Entity (PIE), with the involvement of the Project Implementation Unit (PIU) that will be established under the Project, as set out in the Financing Agreement and the Project Agreement. The International Development Association (the World Bank), has agreed to provide financing (**P180008**) for the Project, as set out in the referred agreements.
2. The Borrower and the PIE shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank, the Borrower, and the PIE, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower, the PIE, and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the PIE. The Borrower and/or the PIE shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>The Project will prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	Quarterly reports prepared and submitted to the World Bank on an agreed format not later than 15 days after the end of each quarter. The reporting will be throughout the project implementation.	Project Director PIU, with support of Environmental, Social and Gender specialists of PIU.
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <ol style="list-style-type: none"> <li>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by Implementing Partners, as appropriate.</li> <li>Subsequently, at the Bank's request, prepare a report on the incident or accident and propose measures to address it and prevent its recurrence.</li> </ol>	<ol style="list-style-type: none"> <li>Notify the World Bank no later than 48 hours after learning of the incident or accident.</li> <li>Provide subsequent report on details of the incident and mitigation actions taken to the World Bank within 30 days of the incident.</li> </ol>	Environmental, Social and Gender Specialists in PIU will submit reports to the Project Director, as applicable. The Project Director will share the incident and accident reports with the World Bank
C	<p><b>IMPLEMENTING PARTNERS MONTHLY REPORTS</b></p> <p>Implementing Partners are required to provide monthly monitoring reports to PIU on ESHS performance in accordance with the agreed template and submit such reports to the Bank upon request as well.</p>	Monthly reports within seven days of end of each month and throughout project implementation.	Environmental and Social Officer of IP will submit to PIU. Environmental, Social and Gender Specialists as well as PD (PIU), as applicable, will review the monthly reports and submit to the Bank upon request.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <ol style="list-style-type: none"> <li>1. Establish and maintain the Project Implementing Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including one Environmental Specialist, one Social Development Specialist and one Gender/GBV Specialist (total three specialists).</li> <li>2. Implementing Partners will appoint qualified Environmental and Social Officers (1 position for each IP) with all necessary material resources, which will supervise the implementation of environmental and social activities related to housing construction works.</li> <li>3. Project will execute Third-Party Validation (TPV) exercise for bi-annual monitoring of Environment and Social compliance progress during the Project implementation and will share their reports with the Bank.</li> </ol>	<ol style="list-style-type: none"> <li>1. Within 30 days of effectiveness and maintain the specialists for the entire implementation period.</li> <li>2. Before commencement of housing construction works</li> <li>3. Bi-annually throughout the project implementation.</li> </ol>	<p>Project Director of PIU will complete the process on a competitive basis.</p> <p>Implementing Partners</p> <p>Project Director, Environmental and Social Specialists of PIU.</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <ol style="list-style-type: none"> <li>1. Prepare and adopt an Environmental and Social Management Framework (ESMF), to screen and assess the environmental and social risks and impacts, including occupational health and safety (OHS), community health and safety (CHS), disaster and construction waste management, chance find procedures and measures for efficient use of resources of the project and suggest appropriate mitigation measures to manage these risks and impacts consistent with relevant ESSs in a manner acceptable to the Bank.</li> <li>2. Conduct a third-party Environment and Social audit of all activities eligible for retroactive financing in Action 1.4 below. PIU to maintain all necessary documentation and record of such activities in compliance to ESF requirements.</li> </ol>	<ol style="list-style-type: none"> <li>1. Adopt the ESMF within 60 days of the Project effectiveness and implement throughout Project implementation</li> <li>2. Third-party audit to be conducted within 30 days of project effectiveness</li> </ol>	<p>Project Director, Environmental and Social Specialists of PIU.</p>

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1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including strategies and standards), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, surveys, environmental and social assessments, etc. are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	Environmental and Social Specialist of PIU with the support of Procurement Specialist.
1.4	<p><b>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</b></p> <p>Prepare and adopt appropriate E&amp;S documents (E&amp;S checklists, ESMP, etc) for each retroactively financed activities.</p> <p>Conduct a third-party E&amp;S audit of all activities subject to retroactive financing, and implement any corrective actions, as required</p>	Before project disbursement	Environmental and Social Specialists, PIU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <ol style="list-style-type: none"> <li>1. Prepare, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for Implementing Partners.</li> <li>2. As an interim arrangement, adopt and implement Government of Pakistan and Government of Sindh Labor policies and procedures aligned with International Labour Organization (ILO).</li> </ol>	<ol style="list-style-type: none"> <li>1. Prepare and adopt the LMP within 60 days of Project effectiveness, and thereafter implement the LMP throughout Project implementation.</li> <li>2. Before the start of Project implementation.</li> </ol>	Environmental and Social Specialists of PIU.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <ol style="list-style-type: none"> <li>1. Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. Grievance mechanism will be responsive to SEA/SH complaints.</li> <li>2. As an interim arrangement, adopt and implement the existing mechanism of GoS to address workers' grievances.</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to engaging the Project workers and maintained throughout Project implementation.</li> <li>2. Before the start of the Project Implementation and prior to engagement of workers.</li> </ol>	Project Director of PIU with support of Environmental, Social and Gender Specialists of PIU.
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Prepare, adopt and implement the occupational health &amp; safety measures specified in ESMF to be prepared under action 1.2 above.</p>	Within 60 days of the Project effectiveness and will apply throughout Project implementation.	Environmental and Social Specialists of PIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>Prepare a waste management plan and implement the mitigation measures for waste management in the ESMF to be prepared under action 1.2 above.</p>	Within 60 days of the Project effectiveness and will apply throughout Project implementation.	Environmental Specialist and Social Specialist of PIU
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Resource efficiency and pollution prevention and management measures will be covered in the ESMF to be prepared under action 1.2 above.</p>	Within 60 days of the Project effectiveness and will be implemented throughout Project implementation.	Environmental Specialist and Social Specialist of PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>Prepare, adopt and implement the occupational health &amp; safety measures specified in ESMF to be prepared under action 1.2 above.</p>	Within 60 days of the Project effectiveness and will be implemented throughout Project implementation.	Environmental and Social Specialists of PIU.

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4.2	<p><b>SEA AND SH RISKS:</b></p> <p>Prepare, adopt, and implement an Action Plan to prevent Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) to assess and manage the risks of GBV and SEA.</p>	Within 60 days of the Project effectiveness and will be implemented throughout Project implementation.	Gender Specialist of PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT POLICY FRAMEWORK</b></p> <ol style="list-style-type: none"> <li>1. Adopt and implement a Resettlement Policy Framework (RPF) for the project, consistent with ESS 5 to provide a guideline for the cases where the land acquisition and resettlement may be involved.</li> <li>2. Preparation of Resettlement Plans (RPs), if required, in accordance with the provisions of RPF and consistent with ESS5.</li> <li>3. Adopt and implementation of RPs consistent with ESS5.</li> <li>4. The Project will ensure that the areas which are affected by Anti-Encroachment Drive (AED) and fall under project districts (which is highly unlikely) shall be excluded from the Project (The AED impacted land will be included in the exclusion list of the RPF). The Project to send a confirmation letter to the World Bank proving that the area is not affected by the AED.</li> </ol>	<ol style="list-style-type: none"> <li>1. Within 60 days of the Project effectiveness and will be implemented throughout Project implementation.</li> <li>2. RPs to be prepared prior to the acquisition of land.</li> <li>3. Prior to the reconstruction of houses on the acquired land.</li> <li>4. Within 60 days before the start of Project implementation</li> </ol>	Social Development Specialist of PIU and Project Director of PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Relevant aspects of this standard shall be considered and implemented as needed under the ESMF under action 1.2 of above.	Will be prepared as part of ESMF as described in action 1.2 and thereafter implemented throughout the Project implementation.	Environmental Specialist of PIU.
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
ESS 7 is not relevant to the Project.			
<b>ESS 8: CULTURAL HERITAGE</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.1	<p><b>CHANCE FINDS</b></p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMF under action 1.2 above.</p>	<p>Within 60 days of the Project effectiveness and will apply throughout Project implementation.</p>	<p>Environmental Specialist of PIU</p>
<p><b>ESS 9: FINANCIAL INTERMEDIARIES</b></p>			
<p>ESS 9 is not relevant to the Project</p>			
<p><b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b></p>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <ol style="list-style-type: none"> <li>1. Adopt and implement the Preliminary SEP (P-SEP) consistent with ESS10.</li> <li>2. Update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to Project Appraisal.</li> <li>2. The P-SEP will be updated and re-disclosed within 60 days of effective date.</li> </ol>	<ol style="list-style-type: none"> <li>1. Project Director of PIU.</li> <li>2. Environmental and Social Development Specialist of PIU.</li> </ol>
10.2	<p><b>PROJECT GRIEVANCE REDRESS MECHANISM (GRM):</b></p> <ol style="list-style-type: none"> <li>1. As an interim arrangement, adopt and implement the existing mechanism of GoS to address grievances and complaints.</li> <li>2. Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances (including SEA/SH GRM) in relation to the Project, promptly and effectively, in a transparent manner in consistent with ESS10.</li> <li>3. Reporting back to stakeholders the on SEP implementation</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the commencement of Project activities</li> <li>2. The Project GRM will become operational within 60 days of project effectiveness and will be available throughout project implementation.</li> <li>3. Starting after six months of the Project Effectiveness and then continue providing reports bi-annually.</li> </ol>	<ol style="list-style-type: none"> <li>1. Project Director of PIU</li> <li>2. Project Director of PIU with support of Environmental, Social and Gender Specialists.</li> <li>3. Project Director of PIU with support of Environmental, Social and Gender Specialists.</li> </ol>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>CAPACITY SUPPORT (TRAINING)</b>			
<b>CS1</b>	<p><b>The training for PIU staff may be required in:</b></p> <ul style="list-style-type: none"> <li>• ESF (since the RA would be a new entity to be set up for the project)</li> <li>• Stakeholder engagement and mapping</li> <li>• Grievance mechanism</li> <li>• Community and occupational health and safety aspects</li> <li>• Pollution prevention and control</li> <li>• Disaster Risk Reduction, Response and Management</li> <li>• Monitoring and Reporting</li> <li>• Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Gender Based Violence (GBV) and Violence Against Children (VAC)</li> <li>• Gender sensitivity</li> </ul>	Prior to initiation of project construction activities and then conducted periodically throughout project implementation.	Environmental Specialist, Social Specialist and Gender Specialist in PIU.
<b>CS2</b>	<p><b>Trainings for Community Workers</b></p> <ul style="list-style-type: none"> <li>• Environmentally friendly construction techniques and materials used in construction</li> <li>• Housekeeping, hygiene, waste disposal and pollution prevention and control</li> <li>• Occupational Health and Safety</li> <li>• Grievance Redress Mechanisms</li> </ul>	Prior to start off and during the construction activities.	<ol style="list-style-type: none"> <li>1. Environmental Specialist, Social Specialist PIU</li> <li>2. Implementing Partners E&amp;S Officers.</li> </ol>