

SINDH PEOPLES HOUSING FOR FLOOD AFFECTEES

Sindh Transformational Accelerated Rural
Water, Sanitation, and Hygiene Services Phase 1
(STAR WASH-1) Project

P515194

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN¹

03/10/2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The GoS (the [Borrower/Recipient]) will implement the **Sindh Transformational Accelerated Rural Water, Sanitation, and Hygiene Services Phase 1 (STAR WASH-1) Project** (the Project), with the involvement of the **Sindh Peoples Housing for Flood Affectees**, as set out in the Loan Agreement (the Agreements) The International Bank for Reconstruction and Development and International Development Association (together, the Bank), have agreed to provide financing for the Project, as set out in Agreements.
2. The Borrower shall cause the Project Implementing Agency to 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 Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement[s].
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreements, the Borrower shall cause the Project Implementing Entity to ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower and the Project Implementing Entity, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank, the Borrower and the Project Implementing Entity's Representatives specified in the Agreements. The Borrower shall cause the Project Implementing Entity to promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE - Establish a dedicated Project Implementation Unit (PIU) for STAR-WASH within SPHF, with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including Sr. Environmental Specialist (one position), Sr. Social Development Specialist (one position), Gender Specialist (one position), Occupational Health and Safety Specialist (one position), Grievance Redress Officer (one position), and other technical personnel necessary for the Project. - For each Regional Office, hire and maintain a dedicated E&S team comprising Environmental and Social Specialists (one position each), along with OHS, Environmental, and Social Officers. - Engage an independent Third-Party Monitoring/Validation Firm to undertake periodic verification of environmental and social compliance, implementation of E&S instruments, and adherence to the commitments outlined in this ESCP	- PIU E&S staffing to be completed within three months of Project effectiveness and maintained throughout Project implementation. - Regional staffing to be completed prior to formal opening of the relevant regional office and maintained throughout Project implementation. - Third-party monitoring firm to be hired within 6-months of project effectiveness; third party monitoring to be undertaken biannually	PIU at SPHF
B	CAPACITY BUILDING PLAN/MEASURES - Prepare and implement a Capacity Building & Training Plan covering the following: - PIU, IP, Engineering Consultant and Contractor Training: Conduct periodic training for PIU staff, Implementing Partners, Engineering Consultants, contractors on ESF and ESSs, ESMF implementation, E&S screening of proposed schemes, ESMP preparation and monitoring, SEP, GRM/GMIS, SEA/SH, and GBV risk management, stakeholder engagement and management, OHS, CHS, labor management, water quality monitoring, FSM/wastewater management, waste management, traffic safety, climate resilience, incident reporting, monitoring, and documentation. - Community, VO, and Worker Training: Conduct training and awareness sessions for VOs, community workers, operators, local facilitators, beneficiaries, and community members on safe WASH construction and O&M practices, OHS, CHS, waste disposal, pollution prevention, safe water handling, sanitation and hygiene behavior, fecal sludge safety, emergency response, GRM access, SEA/SH awareness, and inclusion of vulnerable groups.	- Training Plan within three months of Project Effectiveness - First training session for IP and EC within 30 days of their respective onboarding. Refresher training at least annually and before major district/settlement rollouts. - First session to the contractor staff at the award of their contract. Refresher training at least 6-monthly and before major district/settlement rollouts. - Community Training before commencement of construction or O&M activities in each settlement, and periodically during implementation and O&M transition.	PIU at SPHF.
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: - Status of preparation and implementation of E&S documents required under the ESCP. - Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.	Quarterly throughout the Project implementation. Reports to be submitted to the Bank within 15 days after the end of each	PD, PIU at SPHF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	- Complaints submitted to the grievance mechanisms, the grievance log, and progress made in resolving them. - E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. - Number and status of resolution of incidents and accidents reported under action E below - Water quality monitoring, fecal sludge and wastewater management, OHS and CHS performance, and incidents and accidents. - SEA/SH risk management. ENVIRONMENTAL AND SOCIAL MIS AND DIGITAL MONITORING - Establish and maintain an E&S monitoring and reporting system, integrated with the Project MIS where feasible, to track screening, ESMPs implementation, monitoring visits, consultations, grievances, incidents, water quality results, trainings, corrective actions, and third-party monitoring findings.	quarter, or as otherwise agreed with the World Bank. System to be established within the first year of implementation and maintained throughout the Project.	
D	IMPLEMENTING PARTNERS / ENGINEERING CONSULTANTS / CONTRACTORS MONTHLY REPORTS Require Implementing Partners, Engineering Consultants, contractors, and service providers to submit monthly ESHS monitoring reports covering screening, stakeholder and community engagement, site compliance, OHS, CHS, waste management, traffic safety, GRM, consultations, worker issues, SEA/SH risk mitigation, water quality, fecal sludge/wastewater management, incidents, corrective actions, and training, in accordance with the metrics specified in the respective bidding documents and contracts..	Submit the monthly reports to the Bank/Association upon request.	PIU at SPHF
E	INCIDENTS AND ACCIDENTS - Notify the Bank of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. - Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence..	- Notify the Bank within 48 hours after learning of the incident or accident. - Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	PD, PIU at SPHF
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT INSTRUMENTS - Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. - Prepare, disclose, and implement cluster-specific ESMPs including Waste Management Plans, Traffic Management Plans, Occupational and Community Health and Safety Plans, Water Quality Monitoring measures, fecal sludge/wastewater management measures, tree plantation plan (where applicable) and other instruments required by the ESMF	- ESMF to be adopted and disclosed within three months of Project effectiveness. - Cluster ESMPs to be developed prior to advertising the Request for Bids for the respective clusters	PIU at SPHF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	- Screen all settlements, schemes, WASH facilities, and subprojects using approved environmental and social screening procedures, set out in the ESMF. - Require the contractors to prepare and implement the subproject / site-specific Environmental and Social Management Plan (C-ESMP), as set out in the ESMF.	Screening and site-specific instruments to be completed prior to approval and commencement of relevant works and implemented throughout construction.	
1.2	MANAGEMENT OF CONTRACTORS, SERVICE PROVIDERS, AND VOs Incorporate relevant aspects of the ESCP, ESMF, Labor Management Procedures, and Code of Conduct into the E&S specifications of the procurement documents and contracts, service agreements and field implementation arrangements. Thereafter ensure that the contractors and supervising firms and any other contracted entity comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.	- As part of the preparation of procurement documents and respective contracts. - Supervision throughout implementation. - Copies of relevant contracts provided to the Bank upon request.	PIU at SPHF
1.3	TECHNICAL ASSISTANCE, DESIGN AND STUDIES Carry out consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project including, inter alia, engineering designs, hydrogeological investigations, water and wastewater quality assessments, behavior change strategies, institutional studies, O&M plans, capacity building, and other technical assistance activities are in accordance with the terms of reference acceptable to the Bank that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation. Relevant TORs to be reviewed before procurement of studies, designs and technical assistance assignments.	PIU at SPHF
1.4	CONTINGENT EMERGENCY RESPONSE FINANCING 1. Ensure that the CERC Manual includes a description of the E&S assessment and management arrangements including the CERC-ESMF for the implementation of the CERC Part, in accordance with the ESSs. 2. Implement the E&S provisions of the CERC Manual including the CERC-ESMF, and any assessments and plans required therein.	1. The preparation of the CERC manual and Emergency Action Plan in form and substance acceptable to the [Bank/Association] is a withdrawal condition under Section III.B.1(c) of Schedule 2 of the Loan Agreement and the Financing Agreement, respectively. 2. In accordance with the timeframes specified in the CERC Manual including the CERC-ESMF, and any assessments and plans required therein.	PD of Government of Sindh
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURE Adopt and implement Labor Management Procedures for direct workers, contracted workers, community workers, and other Project workers. The LMP shall include provisions on terms and conditions of employment, nondiscrimination, worker welfare, occupational health and safety, worker Codes of Conduct, prohibition of child labor and forced labor, SEA/SH requirements, protocols for safety of female community	LMP to be adopted prior to engagement of Project workers and implemented throughout Project implementation.	PIU at SPHF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	mobilizers, explicit child safeguarding provisions and requirements for Implementing Partners, contractors, and VOs.		
2.2	WORKER GRIEVANCE MECHANISM Establish, maintain, and operate a grievance mechanism for Project workers consistent with ESS2 and the LMP. The mechanism shall be accessible to direct, contracted, and community and other Project workers, allow confidential handling of sensitive complaints, and include referral pathways for SEA/SH-related grievances.	Established before the engagement of Project workers and maintained throughout Project implementation.	PIU at SPHF
2.3	OCCUPATIONAL HEALTH AND SAFETY MEASURES As part of the ESMF, and the subsequent ESMPs, prepare and implement OHS measures for all WASH-related construction and operational activities, including risk assessments, PPE, toolbox talks, first aid, emergency response, excavation and trench safety, confined space safety, work at height controls, electrical safety, lifting safety, heat stress prevention, safe handling of wastewater and sludge, ABR/septic tank safety, and incident reporting.	Preparation as part of ESMF and subsequent ESMPs and implemented throughout construction, commissioning, and O&M transition.	PIU at SPHF
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT Develop waste management plan outline as part of the ESMF, and specific Waste Management Plans as part of the subsequent ESMPs, for construction and operation activities, including management of excavated material and construction waste.	Preparation as part of ESMF and subsequent ESMPs and implemented throughout construction, commissioning, and O&M transition	PIU E&S Team, Engineering and Supervision Consultant, and Implementing Partners/Contractors
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION Identify in the ESMPs and then implement resource efficiency and pollution prevention and management measures for water, energy, and construction materials. Measures shall address dust suppression, noise control, emissions management, wastewater control, erosion/sediment control and efficient use of materials, including solarized systems where applicable.	Identification at the time of preparing cluster-specific and site-specific ESMPs and implementation throughout design, construction and commissioning.	PIU E&S Team, Engineering and Supervision Consultant, and Implementing Partners/Contractors
3.3	WATER QUALITY MONITORING AND SURVEILLANCE Establish and implement a water quality monitoring and surveillance program for Project-supported water supply systems. The program shall include baseline, construction/commissioning, and operational monitoring of physical, chemical, and microbiological parameters, including priority contaminants relevant to Sindh such as bacteriological contamination, salinity, arsenic, nitrates, and other parameters required by applicable standards. Results shall inform corrective actions and service improvements.	Baseline testing before finalization/commissioning of schemes. Monitoring during implementation and operation at frequencies defined in the ESMF, design documents, water quality program	PIU E&S Team, Engineering and Supervision Consultant, and Implementing Partners/Contractors
3.4	FECAL SLUDGE AND WASTEWATER MANAGEMENT Prepare and implement measures for safe fecal sludge and wastewater management, including collection, containment, emptying, transportation, treatment, reuse, and disposal. Measures shall address leak prevention, odor and vector control, spill response, worker safety, community safety, treatment performance, effluent quality, safe reuse where applicable, and disposal in accordance with applicable regulations	FSM and wastewater management measures are to be prepared before the operation of sanitation systems and implemented throughout operation and maintenance. Construction-stage measures to be	PIU E&S Team, Engineering and Supervision Consultant, and Implementing Partners/Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	. .	implemented before and during works.	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Prepare and implement traffic and road safety measures for the movement of construction materials, machinery, pipes, and workers, as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	PIU at SPHF
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to communities arising from construction and operation of WASH infrastructure, including excavation hazards, open trenches, traffic, public access to work sites, water contamination, wastewater/sludge exposure, vector breeding, communicable diseases, service disruption, emergency events, child safety, and worker-community interactions. Incorporate CHS measures in site-specific ESMPs and community awareness activities.	Same timeframe as for the preparation and implementation of the ESMP.	PIU at SPHF
4.3	SEA/SH RISKS - Prepare and implement a GBV/SEA/SH Action Plan, including worker Codes of Conduct, awareness sessions, training, confidential and survivor-centered grievance channels, referral pathways, safe community engagement practices, and monitoring of SEA/SH risks linked to labor influx, worker-community interaction, and service delivery activities. - GBV/SEA/SH Action Plan must include household entry protocols such as pre-notification, presence of female supervisor or community mobilizer, and provision of the project GM SEA/SH contact; and gender protocols for menstrual hygiene management activities.	Prepare the GBV/SEA/SH Action Plan no later than three months of project effectiveness, and thereafter implement the GBV/SEA/SH Action Plan throughout Project implementation.	PIU at SPHF
4.4	SECURITY MANAGEMENT As part of ESMF and the cluster-specific ESMPs, assess and implement measures to manage security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, particularly in higher-risk areas of Sindh.	Same as Action 1.1 above	PIU at SPHF
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK, LAND SCREENING AND VOLUNTARY LAND DONATION - As part of the ESMF, develop and implement the Resettlement Framework and Voluntary Land Donation (VLD) procedures. - Screen all subprojects for land ownership, land use, encumbrances, access restrictions, informal users, livelihood impacts and disputes. - Ensure land is obtained through ESS5-compliant mechanisms and that VLD, if used, is voluntary, informed, documented, verified and free of coercion. - Prepare and implement site-specific resettlement instruments (RAP / ARAP / Livelihood Plan) where required before taking possession of land or commencing works	- Same timeframe as for the preparation and implementation of the ESMF - Land screening and documentation prior to approval of each subproject and before commencement of works. - Where required, prepare and implement the site-specific RAP / ARAP / Livelihood Plan prior to carrying out the relevant works, including ensuring that before taking possession of the land	PIU at SPHF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY AND NATURAL HABITATS Screen all activities for potential impacts on biodiversity, natural habitats, wetlands, mangroves, protected areas, trees, sensitive receptors, and ecosystem services. Avoid activities that may cause significant adverse impacts on critical or sensitive habitats. Incorporate site-specific mitigation, restoration, and monitoring measures in ESMPs where required.	During screening and design prior to approval of subprojects and throughout construction and operation.	PIU at SPHF
ESS 7: INDIGENOUS PEOPLES / HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	ESS7 Not Relevant ESS7 is not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS As part of the ESMF and the subsequent ESMPs, assess and manage risks and impacts on cultural heritage arising from Project activities.	Same as action 1.1 above	PIU at SPHF
8.2	CHANCE FINDS Include a Chance Find Procedure in the ESMPs and implement chance find procedures during excavation, trenching, construction, and other earthworks. Stop work in the relevant area and notify competent authorities if cultural heritage resources are encountered.	- Same as Action 1.1 above - Throughout construction and any earthworks	PIU at SPHF
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ESS9 RELEVANCE ESS9 is not relevant	Not applicable.	Not applicable.
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare, disclose, and implement the Stakeholder Engagement Plan for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	SEP disclosed on 15th September 2026	PIU at SPHF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	GRM to be established not later than 30 days after the effective date. .	PIU at SPHF
INDICATORS FOR IMPLEMENTATION READINESS			
IR.	IMPLEMENTATION READINESS INDICATORS - The following actions shall be monitored as readiness indicators: - SPHF PIU E&S staffing in place; - ESCP, SEP, and ESMF (including RF) developed and disclosed; - Third Party Monitoring arrangements initiated.	Prior to commencement of major field implementation and updated during implementation as required.	PIU at SPHF