

Initial Environmental Examination

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July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Kandkhot to Jacobabad Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
CO	mg/m ³	Carbon monoxide
dBA	dB	Decibels (A measure of audible noise)
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
GRM		Grievance Redress Mechanism
GFP		Grievance Focal Person
IEE		Initial Environmental Examination
IRI		International roughness index
km		kilometres
Km/h		Kilometres per hour
m		metres
mm		millimetres (1/000 metre)
masl		metres above sea level
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PEPA		Pakistan Environmental Protection Agency
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
SNEQS		Sindh National Environmental Quality Standards
SO ₂		Sulphur dioxide
SPS 2009		ADB's 2009 Safeguard Policy Statement
SSEMP		Site Specific EMP
TPM	micrograms /m ³	Suspended particulate matter, with particles ≥ 10 microns in size, and a danger to lungs. Also referred to as PM ₁₀
S-EPA		Sindh Environment Protection Agency

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 1, the 64 km Kandhkot to Jacobabad Road the road will improve the linkage between Jacobabad, Sibi, Shahdadt and Kandhkot, Kashmir. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and

the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WSD and any contractors on the EMP and the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

Any mosques, graveyards and other cultural sites that could potentially be affected by the work were identified. In the event, three mosques will be affected, two mosques located at chainage 500-.00-600.00 and 42800-42900.00 will be removed and reconstructed and one mosque located at 26800--26900 will be marginally affected. There should be no damage to other cultural sites or to any archaeological sites. Only one tree need to be cut, while trees on the embankments need not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are minor and able to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP is Rs 31,443,548 for the contractor including a 10% contingency.

I. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this aim, GoS requested a loan from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads.
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing a new asphaltic concrete base and riding surface. Other sections will be rehabilitated; involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated ([Table 1](#)) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as

Table 1 List of Selected Roads

Road sections	Km	Km under ADB loan
Kandhkot – Jacobabad (01)	77	77
Jacobabad – Ratodero (02)	55	32
Khyber – Sanghar (03)	64	64
Sanghar – Mirpur Khas (04)	64	64
TM Khan – Badin (05)	67	67
Mirwah – Naukot (06)	64	53
Total	391	238

4. A separate IEE has been prepared for each road. This IEE is for Kandhkot to Jacobabad (road number 1).

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner

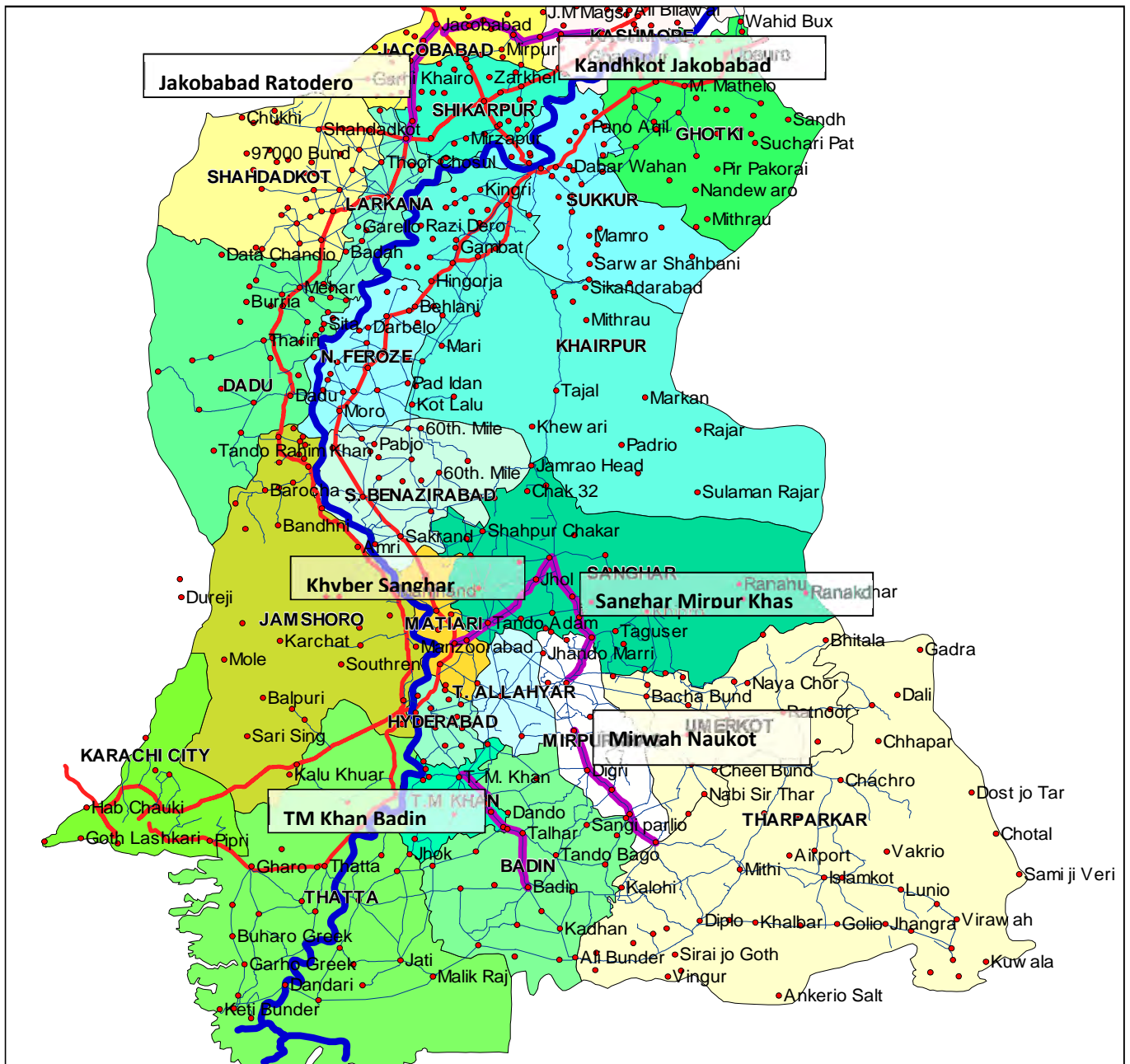


Figure 1 Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational.. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (S-EPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who must ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there will be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road's physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project's corridor of impact – generally considered to extend 15m each side of the carriageway centreline – was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.
13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Legislative and regulatory requirements pertaining to the project were reviewed along with other available data and previous IEE/EIA studies conducted in the region. Studies reviewed included the following:

- Environmental Impact Assessment Study of Multi Tranche Financing Facility for National Highway Development Sector Investment Program Project-2, Sukkur to Jacobabad, Assisted by ADB
- ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-Pak, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
- PAK: Power Sector Rehabilitation Project (Guddu Thermal Power Station) 2012, Assisted by ADB
- Bi Annual Environmental Monitoring Reports for Jacobabad 132KV Grid Stations January, 2014 Assisted by ADB.
- National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
- Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
- Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.

15. In addition, the following web sites were reviewed and relevant information is included in this report.

- <http://www.meoweather.com> date visited: September 2014
- www.pbs.gov.pk date visited: September 2014
- <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure, and action to either prevent or minimize negative effects, was identified and a monitoring requirement specified. These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.

18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter **Error! Reference source not found.** and Annex 1.

II. PROJECT DESCRIPTION

A. Project Description

19. The project is to reconstruct the provincial highway S18 and (Kandhkot-Thul-Jacobabad) between the district centre of Kandhkot - Kashmore and the district centre of Jacobabad. The road reconstructed road passes two provincial administrative towns, Tangwani, and Thul. When reconstruction is complete, the road will improve the linkage between Jacobabad, Sibi, Shahdadkot and Kandhkot, Kashmore.

B. Existing Condition of Project Road

20. The road surface is mostly in good condition from Kandhkot to Saiful section, but the road needs strengthening to cope with expected loads. An estimated (62) km near the Saiful bypass to Jacobabad city end has failed and requires urgent renewal.

21. A typical cross section also showing the existing road is shown as **Error! Reference source not found.**

C. Re-Construction & Rehabilitation to be Undertaken

1. Scope of Work

22. The project design has allowed for the entire length of the Kandhkot to Jacobabad road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides for either or both actions to be taken. A full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations are included in the EMP

23. The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centre line. Both rehabilitation and reconstruction within the existing carriageway are category B works.

2. Reconstruction of existing carriageway

24. Reconstruction work involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.

25.

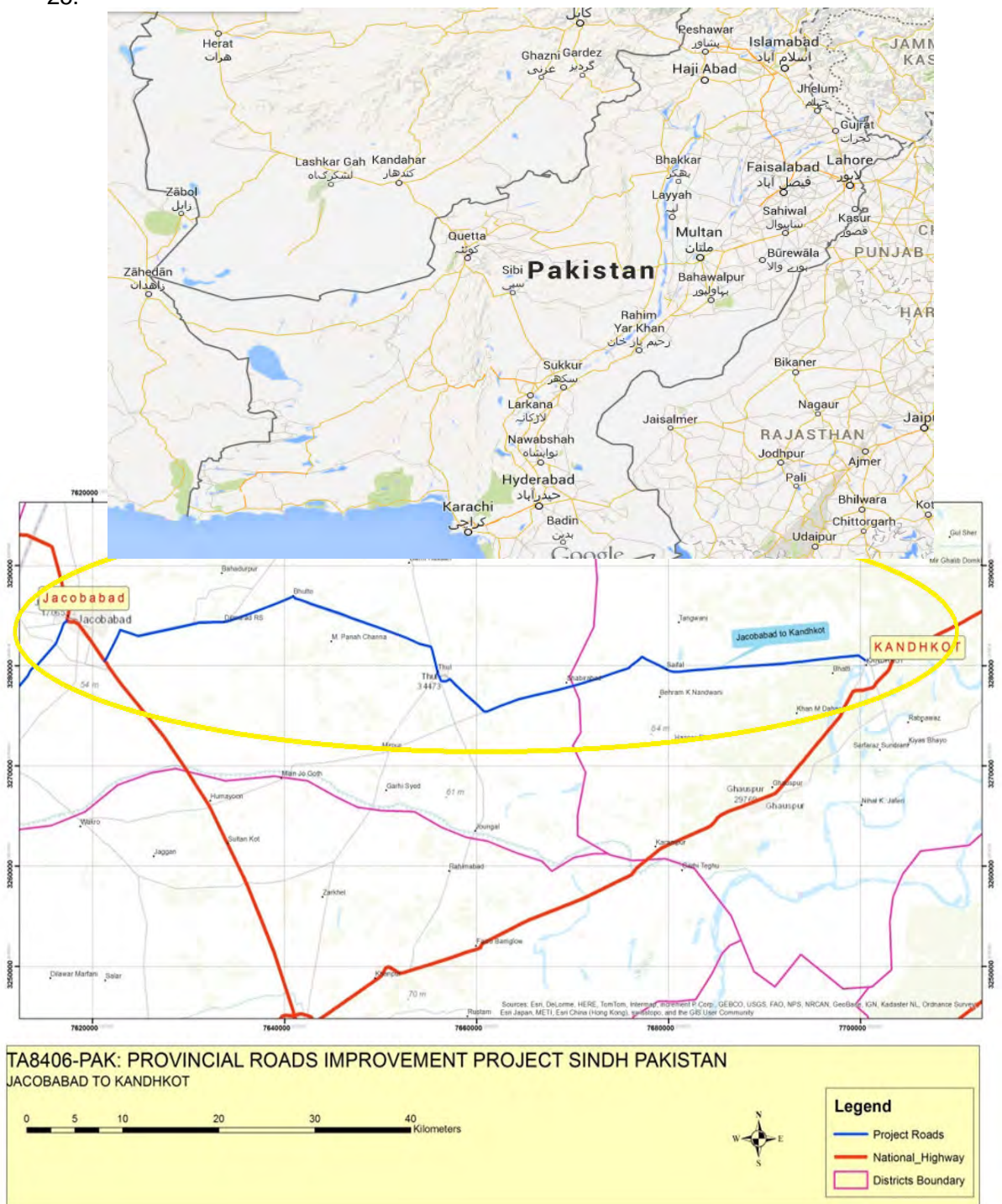


Figure 2 Pakistan showing the location of the Project road

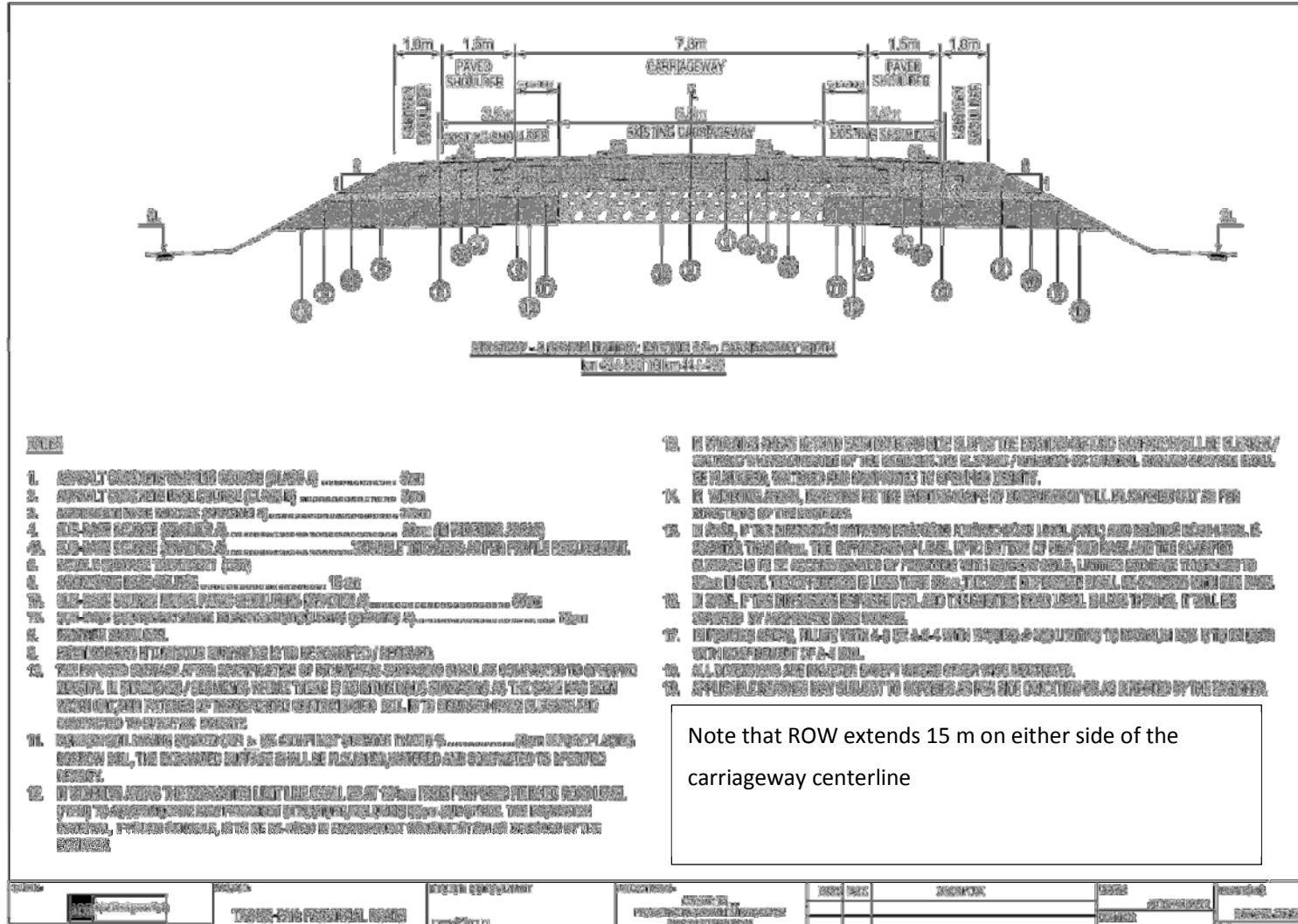


Figure 3 Typical Cross Section

26. The main steps involved in reconstructing a section of road are:

- i. Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- ii. Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- iii. Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- iv. Use recycled or new crushed aggregate to provide a compacted aggregate base course over the width of the pavement (depth may vary as per profile)
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

3. Rehabilitation (Overlay)

27. Rehabilitation involves scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses. The key steps are:

- i. Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- ii. Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- iii. Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- iv. Scarify existing bituminous surfacing. Material removed is to be transported to an approved disposal site.
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

4. Rectification of Bridges

28. There is one bridge located on proposed project Kandhkot - Thul - Jacobabad Road:, which was under construction under ADB Assisted FERP project. There will be no rectification of any other bridge under this project.

5. Reconstruction and Rehabilitation of Culverts

29. Many of the culverts are blocked, damaged or are inadequate. Where the road is to be widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary diversion or to close one side of the road at a time and institute traffic controls. Restitution of the road will follow the steps outlined in section II.C.2 above. It may also be necessary to provide a temporary diversion for the water channel. Ideally the work will be done in dry season when water flows are minimal.

30. The steps for repairing or replacing culverts is as follows:

- All vegetation shall be removed from culvert inlet and outlet up to 5m, from either side.
- Where water channels have to be diverted or construction, this will be done during the dry season and new culverts will be placed on a 30 cm thick sand cushion.
- Where culverts needs extension, provide a 300 mm sand cushion and place lean concrete as a base,
- New reinforced concrete slab culvert to be provided as per the drawings, Re decking of culverts as and where applicable
- The masonry side walls shall be deep pointed including replacement of parts of masonry which has deteriorated and re-laid with good quality bricks and mortar.
- In the base slab all pitting shall be rectified by providing bonding agent and a 75mm thick concrete cover with 10mm diameter bars placed at 250mm centres. Anchor bars shall be drilled into the base slab. The anchor bars shall be 13 mm diameter placed 600 mm centres and drilled 150mm into the base slab.
- The top slab shall be examined for any cracks which shall be repaired with epoxy injection.
- Where the concrete cover has broken and steel reinforcing is exposed, the area shall be marked and all rusted reinforcement shall be removed and replaced by better quality new steel of the same size and area and nailed to the concrete surface. In such areas, concrete shall be chipped to at least

75mm in thickness, a bonding agent shall be applied and concrete shall be applied in the form of plaster. Steel rods 15mm in diameter shall be drilled into the old concrete at 450mm centres and grouted.

- After rectification work is carried out all the areas shall be coated with a polymer reinforced cementitious waterproofing compound.
- The roadway and shoulders shall be restored following section II.C.2 above.

D. Construction Materials

31. Construction materials require transportation from the source to the work site as follows.
1. **Stone**- Stone for base course is available in abundance at Shadi Shaheed quarry Khairpur, which lies at a distance of 110 Km from Jacobabad and 100 Km from Thul. The availability of stone for base course can be supplemented from Ubban Shah quarry, which is at a distance of 115 km from Jacobabad and 105 Km from Thul.
 32. **Bitumen**-The National Refinery Karachi (540 km from Jacobabad) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source.
 33. **Cement** - There is one quite a cement factory in vicinity of project road , namely Rohri Cement Factory in Sukkur (95km from Jacobabad), Zeal Pak Cement in Hyderabad, Lucky Cement Limited and Power Cement Factory in Nooriabad are in range of (400-480 km from Jacobabad).
 34. **Sand**- Good quality of sand is available at Kalri Dudanko quarry which is 15 Km beyond Sukkur as well as from Shadi Shaheed which is in the vicinity of Khairpur (110 km from Jacobabad) There are other quarry sites available in the sub-project area which can be utilized. These are all within 120 km of where road maintenance and rehabilitation will take place
 35. **Steel Reinforcement (Rebar)**- The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:
 - Mehran Mills
 - Islam Mills
 - Hyderabad Mills
36. The distance from Hyderabad mills to Kandhkot, the project start location, is about 450 kilometres.
- **Aggregate and Concrete** - Crushed stone aggregate for concrete is available Ubban Shah Quarry Khairpur and Kalri Dudanko all between 100-120 kilometres range at Khairpur and Sukkur.

- Crushed Aggregate for Asphalt Concrete Ubban Shah Quarry, Khairpur
 - Sub Base (Muram) Ubban Shah Quarry, Khairpur
 - Aggregate Base Course Ubban Shah Quarry, Khairpur
 - River Sand From Indus River Basin
37. For the Kandhkot-Jacobabad road, Aggregate quarries are located within the 100-120 kilometres range at Sukkur and Khairpur.
38. **Bricks-** The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.
39. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation & Drainage Authority. While the amount of water required is considerable, it is should be negligible when compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 10 to 15 meters.
40. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.
- Option 1:** Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.
- Option 2:** Waste material can be used to refill borrow pits and covered with topsoil¹
- Option 3:** Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.
41. The total quantity of material to be disposed of is estimated to be 9010 m³.

¹ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

III. DESCRIPTION OF ENVIRONMENT

42. The description of the environment of the project roads requires baseline data on the following:

- Physical Environment
- Ecological Resources
- Socioeconomic Environment

A. Physical Environment

1. Topography

43. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South. The Kandhkot to Jacobabad road lies in the central alluvial plain.

2. Soils

44. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in the project area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread, but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.

45. The alluvial deposits date back to the time when the Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

46. The seasons in Pakistan can be best classified as

- Winter, from December to March
- Pre-monsoon (summer), April and May
- Monsoon, from June to September
- Post-monsoon, from October to November
- Summer season runs from April until October and winter runs from November to March.

² site visited on dated 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on dated 18.01.2015

47. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, but largely escapes the influence of both, resulting in a rainfall of only 150 to 180 mm per year.

48. For the Kandhkot to Jacobabad road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in [Table 2](#).

Table 2 Average Air Temperature and Precipitation in Kandhkot-Jacobabad road³

Month	Kandhkot			Jacobabad		
	Temperature °C		Precipitation (mm)	Temperature °C		Precipitation (mm)
	Maximum	Minimum		Maximum	Minimum	
January	30	0	0	30	0	0
February	34	2	6	34	2	6
March	42	-2.8	9	42	-2.8	9
April	45.8	9.6	0	45.8	9.6	0
May	50	12.8	3	50	12.8	3
June	50	13	0	50	13	0
July	49	11.7	24	49	11.7	24
August	42	18	12	42	18	12
September	55	15.3	3	55	15.3	3
October	39.7	0	0	39.7	0	0
November	42	-3.3	0	42	-3.3	0
December	35.4	0	3	35.4	0	3

49.

4. Air Quality and Noise

50. The Kandhkot-Jacobabad road is located in a rural area and human activity is primarily related to agriculture, although there are some Rice and flour mills are also. The major air quality issue is Particulate Matter 2.5 (PM2.5). The PM2.5 level can exceed acceptable levels in Kandhkot due to the vehicle source and worst conditions of roads. The situation is aggravated by human activity such as, Old vehicles, Combustion, Old Dumpers/Trucks, wood burning, agriculture burning, and open burning of municipal solid waste. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.

³<http://www.meoweather.com> site visited September 2014

51. Since WSD has not yet established its own environmental monitoring capacity, there are no air quality and traffic noise monitoring data available for existing roads in Sindh Province. Subproject road is located in the rural areas, human activity is mostly limited to agriculture related, Alternatively latest grid stations study and Guddu thermal power station data have been referred in this section; Air quality of the relevant district data referred from the Bi Annual Environmental monitoring reports of January 2014 for 132 KV Grid Station Jacobabad and PAK: Power Sector Rehabilitation Project 2012 (Guddu Thermal Power Station) are reproduced in the. (Table 3) Sampling point of Jacobabad Grid station is located at distance of 4 km from the project road start point and Sampling point of Guddu Barrage (Kandhkot) is located at distance of 50 km from the project road.

Table 3 Ambient Air Quality – Kandhkot-Jacobabad Road ⁴

S.NO	Parameter	Units	Sampling location		GoP Standards /NEQS
			Kandhkot	Jacobabad	
1.	Particulate Matter (PM10)	mg/m ³	0.099	0.039	0.150
2.	Particulate Matter (Pm2.5)	mg/m ³	0.041	0.018	0.035
3.	Sulfur Di oxide	mg/m ³	0.040	<0.02	0.120
4.	Oxides of nitrogen	mg/m ³	0.029	0.005	0.080
5.	Carbon monoxide	mg/m ³	3.05	4.02	5.00

52. Traffic volume is relatively low and the adjacent land use is primarily agricultural. Both road and ambient noise levels increase when the project road enters into a town. Data for Kandhkot and Jacobabad is shown in (Table 4). These noise levels are within the commercial area NEQS /GoP Standard day time limits

Table 4: Noise intensity in medium-sized towns⁵

Noise Intensity	Location		NEQS/GoP Standards	
	Kandhkot*	Jacobabad**	Day	Night

⁴ Bi Annual Environmental monitoring reports Jacobabad Grid Station January,2014 and PAK: Power Sector Rehabilitation Project 2012 (Guddu Thermal Power Station)

Units converted from ug/m³ and ppm to mg/Nm³

⁵ Environmental Impact Assessment Study of Multi Tranche Financing Facility for National Highway Development Sector Investment Program Project-2, Sukkur to Jacobabad, Assisted by ADB and PAK: Power Sector Rehabilitation Project 2012 (Guddu Thermal Power Station)

dBA	54	64	65	55
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*Note: (Kandhkot) Noise sampling point of Guddu Barrage is located at 50 kilometer in north east of project road.

** (Jacobabad) Noise sampling point of Grid station is located at 4 kilometer from project road.

53. These noise levels are within the acceptable range for transport corridors as defined in Pakistan.

5. Hydrology

54. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps in use. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies from 3 meters to 25 meters along the route. Kandhkot and Jacobabad district is irrigated by canals from the Guddu and Sukkur barrage and rain water. However, other modes of land irrigation such as river water and tube wells are also used. The area being fed by Guddu and Sukkur is further divided in perennial and non-perennial system of irrigation. The irrigation network is mainly comprises Kirthar Canal, and Beghari canal. There are, five minors and twenty five water courses crossed by the Kandhkot- Jacobabad Road. These water sources are the major source of drinking water as well as water for irrigation.

55. Excessive irrigation and seepage from canals has caused water logging and salinization problems near Guddu and Sukkur Barrage. Recent floods have exacerbated this problem, since farmers have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface.

6. Seismicity

56. According to the seismic zone map of Pakistan, the Project Area lies in the zone where minor to moderate damage can occur as shown in [Figure 4](#)

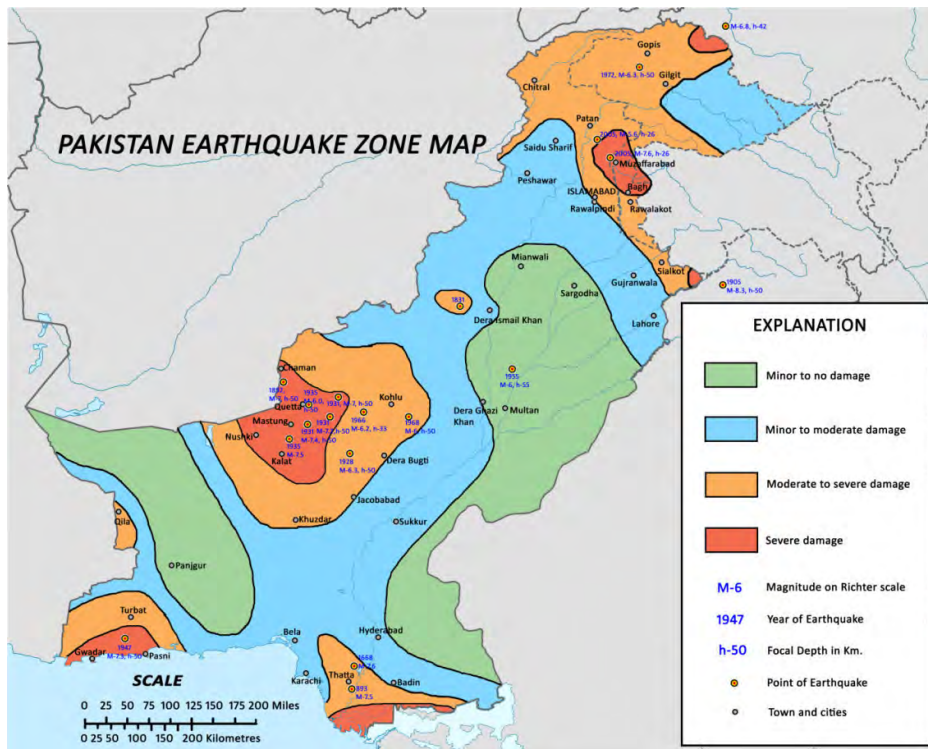


Figure 4 Pakistan Earthquake Zones

7. Archaeological and Cultural Resources

57. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.

58. Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Twenty Eight Mosques and One Graveyard were identified as being potentially affected by the proposed work on the Kandhkot to Jacobabad road. Three mosques will be affected; two mosques located at chainage 500.00-600.00 and 26-800-26-900 will be relocated. A detailed inventory of the sites showing the approximate location of the structures is provided in [Table 5](#). By applying careful highway design all potential impacts were avoided. However care will need to be taken during construction activity.

Table 5 List of Archaeological and Cultural Resources impinging on the ROW

Road name	0-10			11-20			21-30			31-40			41-50			51-60			61-70		
	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G
Kandhkot-	6	0	0	3	0	0	5	0	0	4	0	1	5	0	0	2	0	0	3	0	0

Jacobabad																								
Total	Mosque =28 and Graveyards=01																							

Note: M=Mosque S=Shrine G=Graveyard

B. Ecological Resources

59. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

60. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.

61. The dominant trees in upper Sindh project area are Main trees in the Project Area are Acacia Nilotica (Keekar), Eucalyptus camaldulensis (Safaida), Phoenix dactylifera (Date palm), Dalbergia sissoo (Shisham). Azadirachta indica (Neem), Salvadora oleoides (Peelu) and Ficus religiosa (Peepal).

62. Of more concern would be damage to old plantations of Azadirachta indica (Neem), Albizia lebbek (Shrin), Ficus religiosa (Peepal), Acacia nilotica (Babul), Cordia myxa (Lasura) and Ficus benghalensis (Borh), and recent plantation of Cornucopias. These trees have significant medicinal value and are important culturally and create valuable shade in a very hot climate.

63. Among the grasses; Lumb (Arislida depressa), Chemmer (Eleusine compressa), Gorkha (Lasiurus indicus) and Kana (Saccharum bengalensis) are found in the Project Area. Koondeor Dib (Typha augustata) is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

64. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.

65. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

66. Reptiles include snakes such as cobra (*Naja naja*), rattlesnakes (*Crotalus horridus*) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (*Varanus* sp.), spiny tailed lizard (*Uromastix hardwickii*) and fringed toed lizard (*Acanthodactylus contoris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

67. Important bird species found in the project area are the common crow (*Corvus brachyrhynchos*), common mynah (*Acridotheres tristis*), house sparrow (*Passer domesticus*) and common teal (*Anas crecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdix perdix* and *Melanoperdix niger*), though present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coracias benghalensis*), crested lark (*Galerida cristata*), vultures (several varieties) and quail. White heron (*Ardea alba*) and black heron (*Egretta ardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconia ciconia*), white pelican (*Pelecanus onocrotalus*), little brown dove (*Spilopelia senegalensis*) and white throated king fisher (*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

68. Ecosystems include protected areas such as wildlife sanctuaries, national parks and game reserves. One wild life sanctuary and one wetland which are located in District Kandhkot and Jacobabad of the sub-project but no such ecosystem exist within RoW of the Kandhkot-Jacobabad Road.

69. There is one protected game reserves in Kandhkot -Kashmore District and one wetland in the District Jacobabad. The nearest game reserves area is the Indus Dolphin Reserves area some at 40 Kilometres east and Nara desert some 250 kilometres south of the road corridor.

70. The nearest wetland is Indus Dolphin Reserve is a Ramsar site, located between Guddu Barrage and Sukkur Barrage on River Indus in Pakistan. Stretched on an area of 125,000 hectares, it was designated as a wetland protected site on 10 May 2001. In 1974 it was declared a protected site locally on the recommendation of World Wide Fund for Nature. According to a survey conducted in 1989, there are about 429 Indus river dolphin are present here.

F. Socio-Economic Environment

1. Road Transport

71. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. These data show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in [Table 6](#).

Table 6 Twenty four hour Traffic count (number of vehicles) along subproject road

Location	Motorcycle	Car/ 4wd	Rick shaw	Vans/ PU	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
Kandhkot-Thul	3089	879	1771	1131	37	48	313	91	7	4	238	7605
Thul -Jacobabad	5127	185	754	252	25	3	92	22	6	2	262	6729

72. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons. The Consultant met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to include approximately 900 heavy vehicles a day (mainly 2 axle trucks and tractor-trailers); twice the number surveyed in June.

2. Structures Affected

73. During the topographic survey a small number of structures were found in the Kandhkot to Jacobabad road RoW. None of these have encroached on the pavement, but five structure (Cultural and Commercial) structures are within the paved or unpaved shoulders (including those shown in [Table 5](#)). Details of structures affected, strategy and protection measures are provided in LARP report table S-1. These encroachments are illegal but if people are moved or cultivated land is taken, compensation under SPS 2009 and ADB's Involuntary Resettlement Guidelines is nevertheless required. Resettlement is the subject of a separate land acquisition and resettlement plan (LARP)

3. Drinking Water

74. During the survey it was learnt that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location, with areas close to irrigational canals having comparatively better quality water while water in some other areas is saline.

4. Industrial and Commercial Activities

75. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, Cotton ginning and flour mills. There are also some brick kilns.

5. Employment and Income Sources in Project Area

76. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

77. Agricultural lands are owned by landlords and farmers work for a share of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves. They graze cattle and grow vegetables for food.

78. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.

79. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.

80. Agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers, small business, and as labourers in the cotton and rice industry and 5% are in government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.⁶

6. Demography

81. The project road is located in the Kandhkot and Jacobabad district, and the demography is diverse ([Table 7](#)).

⁶ Project of Sindh irrigation and Drainage Authority EIA report for Works on Khipro and Mithrao Canal; September 2012

Table 7 Demography of the Subproject road Kandhkot to Jacobabad⁷

Factor	Jacobabad	Kashmore
Area sq.kms	5,278	2,682.46
Population (Persons)	1,425,572pers	663,322
• Male	744,014(52.19%)	550.320
• Female	681,558(47.81%)	490.00
Sex ratio	109.2	112
Population Density	270.1persq.k	388
• Urban Population	347,391(24.37%)	255,5239 (25%)
• Rural Population	1,078,181(75.63%)	784,797 (75%)
Avg Household size	5.6	5.2
Literacy ratio 10+	23.7%	39%
• Male	34.08%	58%
• Female	12.30	18%

82. Tribal people include Jamali, Khoso, Bijarani, Kandrani, Domki, Jatoi, Mazari, Dahani, Malik, Lashari, Syed, Shaikh, Soomro, Jakhrani, Bhutto, Bheel. Sindhi language is commonly spoken as mother tongue of majority of the communities in the project area. However, Balochi, Urdu, and Siraiiki languages are also spoken and understood as local languages

⁷ www.pbs.gov.pk

<http://dearsir.pk>

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design and Pre-Construction Phase Impacts

1. Lack of Environmental Capacity

a) Description

83. During the field surveys it became clear that the provincial and district government officials who will be charged with overseeing the construction are unfamiliar with the environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented is low.

b) Mitigation Measure

84. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use

2. Lack of Integration of IEE/EMP Requirements into Construction Bid Documents

a) Description

85. The Bidding documents should reflect the requirement to select a qualified and experienced contractor. Bidding documents has greater emphasis on the methodology on the protection with regards to environmental and social worksite management. The bidder's environmental, social and safety methodology shows material deviation, reservation or omission towards environmental, social and safety specification.

b) Mitigation Measures

86. PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.

3. Loss of Vegetation and Trees

a) Description

87. There are various trees located on the both sides of the Kandhkot to Jacobabad road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to meet road safety standards. There will be loss of vegetation in some

locations, but always within the road ROW According to the LARP report section 1 Table 1.1 one mature tree will be cut to pave the way for the required width of carriageway

b) Mitigation Measures

88. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every tree cut down ,and which is more than 10cm Diameter Breast Height (DBH) .

4. Top Soil Erosion

a) Description

89. The top soil of RoW needs to excavate for reconstruction of the proposed project structure. It will erode and cause disruption local community and vehicle traveller as soil particles displaced and transported easily in air, water and may affect wide range of community assets.

b) Mitigation Measures

90. Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.

5. Disturbance to Archaeological and Cultural Sites

a) Description

91. There are no archaeological sites found in the Kandhkot-Jacobabad road and thus no mitigation measures are required. However three Mosques (Cultural sites) will be affected two mosques will be fully removed and one courtyard will be pushed back.

b) Mitigation Measures

92. Prior to the start of any demolition work, mosque officials will be consulted and a mutually acceptable set of steps implemented. Two Mosques will be relocated and reconstructed at some other place with consent of local mosque officials; Contactor will prepare Mosque relocation plan as part of SSEMP which shall be approved from IA and final approval from ADB is required. Mosque will be protected through concrete guard rail to avoid any disturbance to worshipers, Courtyard will be reconstructed as road construction activities will move forward from Mosque area. It will be ensured that new mosque shall be reconstructed before disturbance to old mosque with adequate facilities This construction will be completed only after consultation with mosque and community officials, but immediately after the work in that area has been completed.

6. Material Haul Routes

a) Description

93. Hauling of material have significant impacts on the community, public safety, traffic congestion, air quality and lifespan of the town road ways.

b) Mitigation Measures

94. Construction vehicles hauling materials along urban roads and anywhere where there are road side residence will be limited and the WSD will establish a route plan to minimize this disruption.

7. Consultation Plan with affected roadside landowners

a) Description

95. The road side and landowner may come across in relation to the road side schedule in installation of new fence, rubbish dumping, weed control and feral animal control which may cause disruption to the road side landowners.

b) Mitigation Measures

96. Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.

8. Contractor's Environmental safeguards Capacity

a) Description

97. The responsibilities of safeguards unit reviews and finalize the document relating to environmental issues. Contractor with less capacity of safeguards do not comply with workplace environmental, social and safety regulations.

b) Mitigation Measures

98. Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

99. A small increase in particulate matter (dust) is expected within construction air shed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

100. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii) spraying of water on unsealed roads and work areas within villages and past houses located close to the road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

101. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plant, require cement and dry sand a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust in emitted when bagged cement is loaded manually into the batch plant hopper, as well as with the conveyor system bringing the materials to the plant.

b) Mitigation Measure

102. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted

3. Topsoil Erosion

a) Description

103. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

104. Excavation of earth fill will be limited to an appropriate depth of 20cm. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored

and then replaced after removal of borrow material. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

105. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

106. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with twelve months of the start of the work. Secondly no construction vehicles will be left idling for more than two minutes.

5. Disposal of Spoil and Solid Waste

a) Description

107. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.

a) Mitigation Measures

108. The asphalt and base course removed from the existing road will be recycled⁸. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverised, spread on access roads and compacted.
109. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective Town Municipal Administration (TMA) and District Administration of Kandhkot and Jacobabad.

⁸ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

110. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

6. Noise and Vibration

a) Description

111. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.
112. Vibration will occur during compaction when vibratory rollers are used to compact subgrade materials. This is unlikely to cause permanent damage.

b) Mitigation Measures

113. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured as per Sindh National Environmental Quality Standards limits.

7. Quarry /Borrow Material

a) Description

114. Transport of construction material (aggregate and fill) may raise environmental and social issues with the possibility of damage to bridges and pavements if vehicles are overloaded.
115. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

116. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.
117. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Borrow material must be

taken only with the consent of the land owner and if the contractor is found to be in violation, will be fined in addition to having to completely rehabilitate and re-vegetate the site(s).

118. The contractor will ensure that the use of productive and agriculture land and the loss of vegetation is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

119. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.

120. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.

121. During rehabilitation work on culverts and bridges the canals and water courses crossed the Kandhkot to Jacobabad road, could become polluted by accidental discharge of cement and other chemicals like epoxy and paints.

b) Mitigation Measures

122. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA approved site. New soil should be brought in as required so that the ground surface is re-established.

123. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.

124. Water channels must be diverted properly and a protection mechanism provided. Alternatively construction should be undertaken during the dry season.

125. Water channels will be monitored for their quality against "irrigation water quality standards" of Water and Power Development Authority, WAPDA. Ground water quality will be monitored against National Drinking water quality standards

9. Damage / disturbance to Utilities Services

a) Description

126. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

127. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance

a) Description

128. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

129. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

130. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitos and rodents.
131. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.
132. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.
133. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if

breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

134. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or let enter streams where it can affect downstream water quality, aquatic environments and human health.
135. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.
136. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area where cement dust is in the air.
137. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to insure compliance with the requirement of dust masks.

12. Interruption/ Contamination of Water channels

a) Description

138. There are thirty watercourses crossing the project road: details were given in table 5. Repair or replacement of the crossing will often require temporary diversion of, or work within, the watercourse. This could affect the water supply to agriculture land of communities living nearby, and could lead to contamination.
139. Temporary traffic diversions disrupt and can be a danger to traffic.

b) Mitigation Measure

140. Where water crossings are being repaired. The water channel should be diverted or a protection mechanism provided to avoid contamination. Where possible, construction will be made in dry season.
141. The contractor should provide an adequate sized diversion so that there shall be no disturbance to water flows of canal /water course.

142. A traffic management plan shall be provided by the contractor. Signage and lighting may also be provided to reduce the likelihood of accidents.
143. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed

13. Burden on Local Resources

a) Description

144. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife. The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

145. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

14. Inadequate Camp Site Good Housekeeping

a) Description

146. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

147. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.
- Train work force in storage and handling of materials
 - Fire fighting
 - Camp sewage will be treated in soaking pit and garbage management, by provision of EPA-compliant means of disposal.
148. Contractor will prepare as part of site specific EMP following which will be approved from EA and final approval will be sought form ADB.

- Traffic management plan
- Waste management plan
- Borrow site management plan
- Camp site management plan
- Mosque relocation plan / approval

C. Operation Phase Impacts

149. Most of the impacts at the operation stage are positive and do not require mitigation. These include:

- Improved access to markets
- Reduced travel times
- Lower vehicle operating costs
- Reduced dust

150. However there are some negative impacts and these are listed in the following sections.

1. Lack of Environmental Safeguards

a) Description

151. While the proposed project will be completed with follow of environmental safeguards of the EMP. The contractor has to ensure the action taken during all stages with compliance of this EMP.

b) Mitigation Measure

152. The contractor, will provide mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released

2. Increased Traffic Volumes

a) Description

153. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

154. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

3. Increased Risk of Accidents

a) Description

155. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.
156. The road design has had to balance the requirements of SPS 2009 to minimise displacement of encroachers and land acquisition against road safety

b) Mitigation Measures

157. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds
158. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.
159. Traffic police should be trained to more consistently enforce road rules.
160. One of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties should be sought.

V. GRIEVANCE REDRESS MECHANISM

A. Organisation

161. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Kandhkot to Jacobabad road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.
162. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, Grievance Focal Person (GFO) who can be Community Leader, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.
163. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with appointed GFO prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessible to potentially affected persons through GFO.
164. Contact details will be distributed by the GRO to GFO in the appropriate local language, for posting in the village office.
165. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

166. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.
167. The first step ([Figure 5](#)) on receiving a grievance will be for the GRO to refer the matter to the contractor, who will be given one week to respond to the grievance.
168. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.

169. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.
170. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.
171. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:
- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
 - (ii) Updating the complaints database routinely;
 - (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
 - (iv) Collecting and submitting input for inclusion in progress reports for ADB.

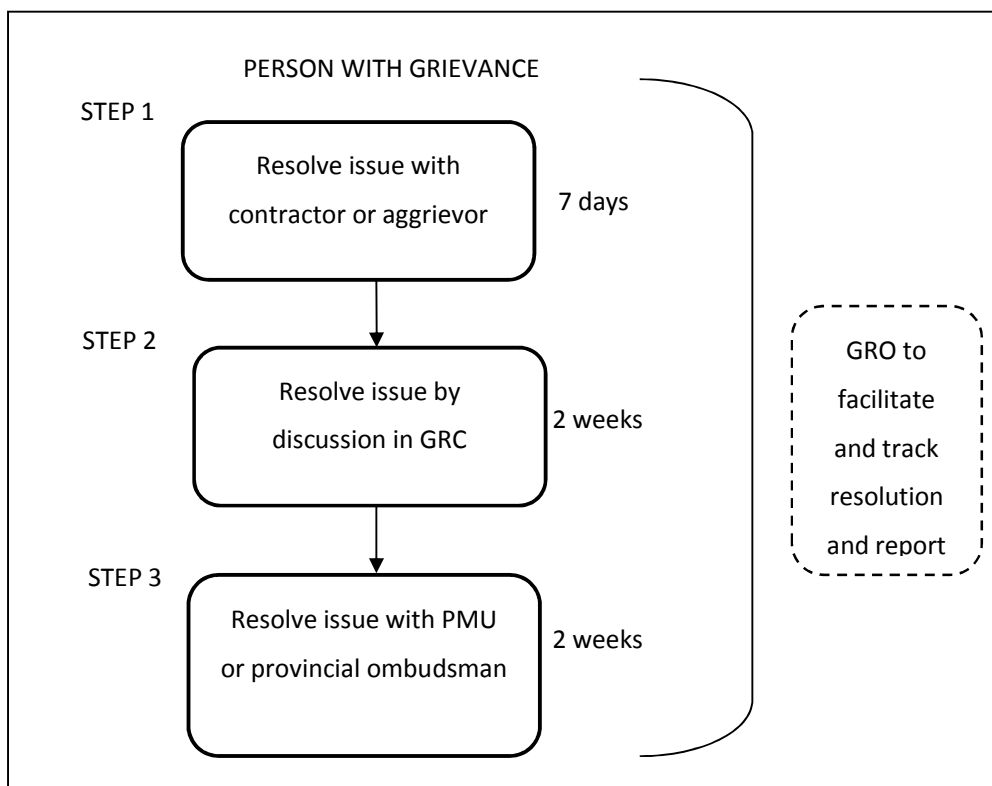


Figure 5. Steps of the Grievance Redress Process

VI. PUBLIC CONSULTATION

A. Objectives of Public Consultation

172. The overall objectives of the consultation process were as follows:
- To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
 - To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
 - To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
 - To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

173. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Kandhkot and Jacobabad as well Assistant Commissioner Jacobabad. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.
174. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

175. Community consultations consisted of formal and informal meetings at Kandhkot, Thul and Jacobabad City. The meetings were conducted on dated 05.09.2014 to 07.09.2014. The consultation exercise was conducted in both Sindhi and Urdu languages. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.
176. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.
177. The people interviewed (Table 9) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

178. A matrix of concerns raised by community members was prepared ([Table 8](#)). The register of attendance is provided as Annex-2 [Table 9](#). Other people joined the discussions but declined to be identified. A pictorial record of the meetings is included as Annex -2. Note that residents in Jacobabad were asked about both this road and the Jacobabad –Ratodero road. Where relevant, their comments may be included in both IEE. Other people joined in the discussions but declined to be identified.

Table 8: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns raised by community	Remarks
Road design	Storm drainage should be provided at Kandhkot and Jacobabad areas Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction / Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss at the Jacobabad – Kandhkot Road during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	Construction will be programmed to minimise the length of disruption at any one point These issues will be addressed once road constructed

179. As appropriate these concerns have been incorporated into the EMP items and have been related to the appropriate WSD officers. They should be taken up by the safeguard specialist when appointed.

Table 9 General Public interviewed during Public Consultation at Kandhkot Jacobabad Road

Name	Town/Village	Position / Occupation
Mr. Ayub Malik	Kandhkot	Private Business (Filling station)
Mr. Asghar Dhani	Kandhkot	Engineer
Mr. Mumtaz Malik	Kandhkot	Private job
Mr. Rafiq Malik	Kandhkot	Private job
Mr. Usman Lashari	Kandhkot	Worker
Mr. Allahwadayo Khan	Kandhkot	Retired
Mr. Abdul Ghaffar	Kandhkot	Business
Mr. Asif Ali	Thul	Shopkeeper
Mr. Nazeer Ahmed shah	Thul	Shopkeeper
Mr. Ghulam Murtaza	Thul	Unemployed
Mr. Ghulam Rasool	Thul	Worker
Mr. Akbar ali	Thul	Worker
Mr. Muhammad Ishaq	Thul	Worker
Mr. Javed Ali	Thul	Worker
Mr. Abdul Khaliq Sarki	Thul	Worker
Mr. Arbab Ali	Thul	Worker
Mr. Nasurullah Khan Kandrani	Ibrahim Kandrani	Engineer
Mr. Ubaid Khan	Ibrahim Kandrani	Private Job
Mr. Khadim Kandrani	Ibrahim Kandrani	Private Job
Mr. Sadaqat Ali Dayo	Ibrahim Kandrani	Private Job
Mr. Safdar Dayo	Ibrahim Kandrani	Private Job

3. Government Agencies

180. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices (**Error! Reference source not found.**). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below. Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in Table 9. Pictures of the meetings are provided in Annex-2. Note that the Government offices at Jacobabad and Kandhkot have jurisdiction over Jacobabad-Ratodero road as well. Hence some consultation comments will be repeated between IEE

a) Assistant Commissioner and Municipal Office (Jacobabad)

181. A meeting for consultation was held with Assistant Commissioner Kashif and Office Superintendent (Acting Town Officer) on dated on dated 03.09.2014. They raised the following points after welcoming the proposed project activity in his area of

command. The meeting was held at the Office of the Deputy Commissioner Office Jacobabad and Town Municipal Office Jacobabad. Their views are as under:

- They raised concern related to construction activities, including air pollution (dust), traffic jam, and security.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the Jacobabad and Ratodero; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in Jacobabad city.
- Rice husking traffic will need to be managed in the area of Rice Mills.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents contractor shall ensure the lighting and signage around the road diversions.
- Local people should get preferential treatment for the employment on the road project.

b) Additional Deputy Commissioner and Taluka Municipal officer (Kandhkot)

182. A meeting was held with Mr. Abdul Ghaffar Soomro Additional Deputy Commissioner, and Mr. Mehtab Ali Taluka Municipal Officer. The meeting was held at District Complex Kandhkot on dated 04.09.2014. After welcoming the project, they raised the following points.

- He supported the project and were of the opinion that there is dire need of these kinds of project shall be started as soon as possible.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the Kandhkot; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents.
- He also suggested that during session of Sugar-cane crushing and rice husking traffic shall be managed in the areas.

4. Non-Government Organizations

After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development, were consulted for this project during dated 04.09.2014 to 07.09.2014. Attendance lists of the stakeholders from the six NGOs consulted in the subproject was collated and reproduced in Table 10 following were the major comments and suggestions; **Error! Reference source not found.**

- As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- Better road conditions will reduce the rate of accidents around the sugar mills

- Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.

C. List of Public and NGO Sector Stakeholders Consulted

183. A number of stakeholders, other than the general public, who are likely to benefitted or be involved during the project execution phase, were also consulted Table 10

Table 10 List of Public and NGO Sector Stakeholders

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Mehtab Ali	District Government	Town Officer
Mr. Abdul Ghaffar Soomro	District Government	Additional Deputy Commsioneer
Mr. Kashif Ali	District Government	Assistant Commissioner Jacobabad
Mr. Khadim Hussain	NGO	(CEO) AAS Research Foundation Jacobabad
Mr. Muhammad Muslim	NGO	Executive Director Community Development Network Organization
Mr. Muhammad Jan Odho	NGO	(CEO) Community Development Fund
Mr. Badaruddin Shah	NGO	Liason Officer ACTED International NGO
Mr. Yasir Arfat	NGO	Project Manager (HANDS)
Ms. Seema	NGO	ERADA Trust

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

184. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects-monitoring mechanism, defined in the EMP's two action tables.

B. Environmental Management Plan for Kandhkot to Jacobabad Road

185. The EMP, mitigation and monitoring tables for the Kandhkot to Jacobabad road is included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs ([the BOQ items by the contractor.](#)

186. [Table 11](#)) will be used to prepare a specific environmental safeguards section in the construction Bill Of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

187. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

188. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential negative impacts. The value of the environmental assessment process can be undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

189. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20m-25m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.

190. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.
191. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions.. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.
192. A Site specific EMP (SSEMP) is to be prepared by the contractor, based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.
193. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

194. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which need to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit (ESU) (a section within the PMU) will be mainly responsible for implementing the EMP.
195. There are fourteen Construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

3. Operating Phase

196. Operation period actions focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. All the work proposed is on existing roads and confined to the existing RoW. There will be some increase in the speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2). Speed limits will be monitored through traffic police as discussed earlier.

197. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:

- Less travelling time
- Quicker access to Market
- Fuel efficiency
- Less dust generation
- Safer journeys

C. Cost Estimates

198. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs and monitoring visits, training costs, etc. Table 11 shows the cost to be included in the BOQ items by the contractor.

Table 11 EMP Implementation and monitoring estimated cost for Contractor

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 191 persons)			465562	465562	931124
Generators & Construction Machinery Noise Monitoring	7000	78	6552,000	6552,000	13104,000
Drinking Water Quality Monitoring (During Const)	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	8000	191	152,8000	-----	152,8000
Personal Protective Equipments (for 200 persons approx) replacing every year)		200	1070000	1070000	2,140,000
Fire Fighting Equipments purchase and refilling		30	250,000	100,000	350,000
Health & Hygiene	--	--	738960	738960	1477920
Canal Monitoring (Pre-Const, During	4,000	30	1500,000	1500,000	3000,000

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Const,) 1 month for pre-cons + 24 month of Construction					
Ambient Air Monitoring (Pre-Const, During Const,) Three Places (Two towns + Asphalt plant) on monthly basis	27000	36	972,000	972,000	1944,000
Noise Monitoring (Pre-Const, During Const,) monthly basis at 15 sensitive locations	750	15	135,000	135000	270,000
Environmental Officer Salary	150,000	1	1800,000	1800,000	3,600,000
Subtotal					28585044
Contingency Cost 10%					2858504
Total					31,443,548

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

199. The Sindh provincial road improvement project will be coordinated by the Works and Services Department as an executing agency (EA) with a project management unit (PMU) established within WSD as Implementation Agency. The PMU will be self-sufficient to monitor the environment related issues.

200. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

201. The Project Management consultant (PMC) will support all Deputy Directors and PMU for project development. The PMC's environment experts will support the

ESU in ensuring that project roads comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 ([Table 12.](#))

Table 12 Implementation Organisation for Road Reconstruction and Rehabilitation

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International ECIL
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

202. The ESU will, with assistance from of the PMC environmental specialist:
- Prepare environmental screening checklists;
 - Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
 - Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
 - Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
 - Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors;
 - Ensure that the required environmental training is provided to the staff concerned;
203. Contractor will hire two full time persons to address the environmental safeguards; Environmental Engineer's responsibilities will include;
- Prepare Site specific EMP as per generic EMP of this road.
 - Monitor the work and undertaken the monthly reporting.
 - Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
 - Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
 - Coordinate with PMU Environment specialist to conduct site visits.
 - Impart trainings as per schedule.
 - Prepare monthly environmental monitoring report
204. Environment inspector responsibilities will include;
- Conduct day to day Site inspection activities for any non-compliance
 - Conduct environmental monitoring activities through certified environmental laboratory.
205. ADB's responsibility will be to review IEEs as a basis for the approval of the subproject.

3. Monitoring and Reporting

206. Following section describes monitoring and reporting frequencies and responsibilities;

a) Implementing Agency

- The IA's Environmental Safeguards Unit will prepare a compliance monitoring checklist, based on the EMP and brief Environment Engineer of the Contractor on its use and implementation schedule. The checklist will be completed monthly.
- Carry out field visits for HSE compliance monitoring on quarterly basis
- The Implementing agency will use the compliance checklist reports, plus a semi-annual audit of the work as the bulk of the content of the semi-annual construction monitoring report to ADB..

b) Project Management Consultants

- Ensure the compliance monitoring is being carried out monthly, quarterly and semi annually during the construction period.
- If non compliance is recorded, conduct review meetings with Contractor to address the non-compliance.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, defining what mitigative actions have been undertaken and where this work was done.
- Conduct the Environmental Monitoring (Air, Drinking water Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in the EMP ([Table 13](#)).

Table 13 Monitoring and reporting frequencies

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
1.	Environmental monitoring plan for Canal Water Monitoring						
a	Pre-Construction	Thirty water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Once	WSD	PMU
b	Construction	Thirty water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Monthly	Contractor Environment Engineer	Supervision Consultant
2.	Environmental monitoring plan for Drinking Water						
a	During Construction	Campsite	Biological Parameters	E-Coli, fecal coli form, Total Coli form	Quarterly	Contractor Environment Engineer	Supervision Consultant
b	During Construction	Campsite	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Quarterly	Contractor Environment Engineer	Supervision Consultant
c	During Construction	Campsite	Chemical Parameters	Chloride, Fluoride, Nitrate, Nitrite, Pb, Zn.	Quarterly	Contractor Environment Engineer	Supervision Consultant

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
3. Environmental monitoring plan for Ambient Noise							
a	Pre-Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Once	WSD	PMU
b	During Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Monthly	Contractor Environment Engineer	Supervision Consultant
4. Environmental monitoring plan for Air Emission							
a	During Construction	Campsite	Construction Machinery & Generators	CO/CO ₂ , SO ₂ , NO _x , PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant
5. Environmental monitoring plan for Ambient Air							
a	Pre-Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Once	WSD	PMU
b	Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant

d) ADB

- Review the biannual monitoring report and follow up all outstanding issues.
- Approve any proposed changes to the management plans or procedures

VIII. CONCLUSIONS AND RECOMMENDATIONS

A. Principal Findings

207. This IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services department. This IEE is in respect of the Kandhkot to Jacobabad road.
208. The proposed rehabilitation/reconstruction of the Kandhkot to Jacobabad road will have very little environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites or on fauna or flora. The environmental category is 'B'. There is a minimal requirement for resettlement of illegal encroachers; this is being addressed in a separate LARP.
209. The following are the main issues identified and concerns raised during the study:
- The project is in predominantly bad condition and travelling time is around double the time that would be expected for a road in good condition;
 - The road embankment is eroded in some places;
 - There is one graveyard are impinging to the ROW of the project road Three mosques will be affected, The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
 - There is no major canal but minor canals and waterways crossing the road, requiring special care during construction works
 - There is no protected forest in Kandhkot and Jacobabad RoW.
 - There is No wetland or any ecological sensitive area found in RoW; these are at considerable distance and will not be affected due to the project activities

B. Conclusion

210. The improvement of the Kandhkot to Jacobabad road, part of the Provincial Road Improvement Project of the Government of Sindh, is limited to road reconstruction within the existing right of way. It is therefore likely to have only limited impact of a temporary nature and short duration. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
211. Provided the EMP is followed, there should be no damage to cultural and archaeological sites except two mosques which will be relocated and contractor will prepare the Mosque relocation as part of SSEMP will be approved by IA and ADB. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by concerned agencies, including Contractor, Environment Specialist ES (PMC) and PMU-W&S Department. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.
212. This IEE study concludes that the proposed pilot road project will not lead to significant adverse environmental and social impacts of such nature or magnitude that would require a more detailed report in the form of an EIA. Additionally careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.
213. The project has been discussed with local people, government officials and NGO. The consultations elicited general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked. The main concerns expressed were to ensure that local people got employment on

the project and that measures were in place to avoid excessive noise or dust. There was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

214. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.
215. The following recommendations are carried over from the text:
- Environmental monitoring shall be carried out by the IA and contractor in compliance with the EMP to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
 - The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
 - Trees located on the embankments will not be disturbed.
 - Asphalt plant shall be located at least two kilometres from settlements
 - Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
 - Excavation of earth fill will be limited to an appropriate depth of 20cm.
 - Canals and other water resources will be closely monitored to ensure no contamination occurs due to project related activities
 - A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
 - Health and safety plans will be prepared.
 - Construction work shall not hinder local people's access to nearby facilities.
 - SSEMP will be developed by the contractor which needs to be reviewed by the PMC, approved by IA and final approval is required from ADB. Contractor will not be able to start the construction till the SSEMP is not approved.
 - An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
 - A grievance redress mechanism will be implemented by the contractor to ensure that community complains are addressed and recorded.

Annex 1

Table 14 Environmental Management Plan: Environmental Mitigation Table
(Emit) and Environmental Monitoring Table (EmoT)

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for Jacobad to Kandhkot road	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	Mosque Relocation plan will be prepared by the WSD. Mosque officials will be consulted for the new place; Protection through guard rail will be provided to mosque. The budgetary cost of relocation is mentioned in the LARP report table ES-3	During Planning phase in parallel with preparation of bid documents	At following chainage will be removed and relocated i. 500.00-600.00 ii. 42800.00 At following chainage only courtyard will be pushed back i. 26800-26900	WSD	Supervision Consultant
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact	Completed prior to contractor mobilization and provided the contractor as part of the contract	NA	WSD	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.	documentation			
1.8. Contractor's Environmental Safeguards Capacity	Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Plan to be provided the Consulting Engineer and PMU prior to start of work	WSD	WSD	Supervision Consultant
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted				
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
216. 2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be minimised by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, 	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	iv. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution.				
2.5 Disposal of Spoil and Solid Waste					
i. asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
ii. Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	<p>i The contractor will identify dumping locations for construction debris and non-hazardous solid waste with respective TMA of Jacobabd and Kandhkot.</p> <p>ii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.</p>	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise & Vibration					

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
i. Noise and Vibrations associated with earthworks and haul roads.	<p>i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village.</p> <p>ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800.</p> <p>iii Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities.</p>	During Construction period	Construction areas	Contractor EHS Inspector	Supervising Consultant
ii. Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor EHS Inspector	Supervising Consultant
2.7 Quarry/Borrow Materials					
i. Overloading of trucks, may damage pavement, bridges, and culverts	i. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Throughout construction period	Construction sites	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor EHS Inspector	Supervising Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			
2.8 Contamination of Water Resources (Surface& Ground)					
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>				
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Before the start of construction work.</p> <p>Design phase.</p>	Where utilities services located	Contractor EHS Inspector	Supervising Consultant
2.10 Traffic Disturbance					
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.11 Health and Safety Concerns					
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with masks of a micron size, capable of capturing dust down to 2 microns.</p> <p>iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment.</p> <p>v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD &STI).</p>	Construction period	Construction Camps, Construction sites and Asphalt Plant area	Contractor EHS Officer	IA
2.12 Interruption /Contamination of Water channels					
	<p>i. Contractor should provide the adequate sized diversion, so that there shall be no</p>	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>disturbance to water flows of canal /water course.</p> <p>ii. Protection mechanism should be provided to avoid contamination.</p> <p>iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>				
2.13 Over Used Local Resources					
Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
217. 2.14 Contractor Good Housekeeping Practices not Applied					
	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection program must be established</p> <p>iii. Monitoring will be required for</p>	Throughout the construction period	All construction camps , work areas and contractor 'yards'	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>				
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD & Contractor	WSD
218. 3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	-
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed limits shall be monitored by the traffic police to avoid any accident and	Operation period	As per design	Contractor and Traffic police	ES/PMU /IA

EMiT

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	subsequent spillage. An emergency service may be provided by the local authorities.				

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP	Before the tendering and before contract finalized	Date and time that confirmation completed filed with PMU	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Monitor to obtain copy of plan and record compliance—for presentation in smi-annual audit report	Prior to start of construction	Date and time that confirmation completed recorded & filed with PMU	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and and compensation of losses Land owners will be compensated This will be monitored through ES- PMU</p>	Monitor checks that topsoil management steps prepared and ready for implementation	During Planning phase, in parallel with the preparation of bid documents	Copy of topsoil protection actions	PMU	Supervision Consultant
1.5. Disturbance to and Archaeological Cultural Sites	<p>Mosque Relocation plan will be prepared by the WSD.</p> <p>Mosque officials will be consulted for the new place;</p> <p>Protection through guard rail will be provided to mosque.</p> <p>The budgetary cost of relocation is mentioned in the LARP report table ES-3.</p>	<p>Mosque Relocation plan confirmed by PMU planners</p> <p>Cost of relocation shall be incorporated in BOQ item</p>	Planning phase	Written and dated note indicating compliance	PMU	Supervision Consultant
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report	Prior to contractor mobilization	Written and dated note indicating compliance & inspection	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside	The work along this road will affect the access from a business and residence	Review of plan and confirm a)	Completed prior to contractor	Written and dated note	PMU	Supervision

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement- ed by	Supervis- ed by
landowners	to the road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access	consultation a) inclusion of proposed b) inclusion of timetable and c) inclusion of clean up and reconnection action.	mobilization and provided the contractor as part of the contract documentation	indicating compliance		Consultant
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<p>i. The Contractor will be required spray water on unsealed roads and work areas daily, within villages and past houses located close to the road and giving priority to sealing in urban areas.</p> <p>ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas.</p>	Travel work areas and check for dust—and if found take immediate action with contractor	Anywhere where there is material moved, earthworks cutting and filling.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	<p>Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate action with contractor. Inspect batching plant dust suppression mechanism, its maintenance log book.</p>	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land 	<ul style="list-style-type: none"> i. Check query sites for depth. ii. Ensure contractor store topsoil properly, and restore query site as much as possible at end of work. iii. Ensure Land owner get adequate compensation 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken	WSD	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	owner and contractor					
2.4 Increase in air pollution from vehicular and machinery exhaust	Emissions will be kept to a minimum by: <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes and iv. Equipment maintenance specifications will be imposed through construction inspection and regular reporting. v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	Record findings and conduct regular inspections in association with construction supervision	Throughout the construction period	Inspection note to file for use in contractor reporting and in semi-annual audit report	PMU	Supervision Consultant
2.5 Disposal of Spoil and Solid Waste						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement-ed by	Supervis-ed by
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps.	<p>i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective TMA's of Kandhkot and Jacobabad and EPA Sindh. (regional office of District Sukkur)</p> <p>ii. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
2.6 Noise & Vibration						
i. Noise and Vibrations associated with earthworks and haul roads.	<p>i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village, Same approach is to be taken if the other site is used.</p> <p>ii. Restricting operating hours through</p>	Using a portable noise meter, monitor checks conditions , and inspects if work conducted within permitted time period on urban	Throughout construction period	Inspection note, signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement- ed by	Supervis- ed by
	roadside villages and settlements to between hours of 0700 and 1800. iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.	zones				
ii. Excessive Noise at sensitive sites, identified in IEE, i.e. schools, residential areas, mosques, health care centers	ii. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Noise measurements at these sites recorded by monitor and if excessing, immediate action to erect temporary barriers	Throughout the construction period	Inspection note with noise reading results	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						
i. Overloading of trucks, damaging pavement, bridges, culverts etc	i. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials	Throughout construction period.	Inspection note re findings, dated and signed		
2.8 Contamination of Water Resources (Surface& Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be</p>	Regular inspection of work camps, contractors yard, fueling areas , fuel storage	At least monthly throughout the construction period.	<p>Checklist showing check fuel and lubricant handling, waste oil management , machinery was down water control, etc. signed and dated-- filed.</p> <p>Checklist showing the check for lighting and</p>	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement- ed by	Supervis- ed by
	permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing. iv. All diversions must be checked for Signages and lightings on weekly basis,	Regular monitoring of diversion for signages and lightings	At least fortnightly where diversions are placed	signages signed and date filled		
2.9 Damage / disturbance to Utilities within RoW	i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.	Review of notifications and approvals from all utilities as per the legal requirements	Before the start of construction work. Design phase.	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.10 Traffic Disturbance						
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Inspect construction areas where access is an issue and establish if contractor is managing problem and if local residents are satisfied	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement-ed by	Supervis-ed by
2.11 Health and Safety Concerns						
i. Protecting the workforce and maintaining a safe working environment. ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.	i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides. ii. ii.Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment. iii. All Construction labour and staff of the contractor and consultant will briefed in STD's and given option to be tested (personal choice).	Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.12 Intruption /Contamination of Water Sources						
	i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanisim should be provided to avoid contamination. iii. Contractor should prepare	Inspection of diversion along the road, check signages, lighting any leakage etc at the diversion	Culverts and bridges	Contractor EHS Officer	IA /PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implement- ed by	Supervis- ed by
	<p>traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>	<p>and rectify through contractor.</p> <p>Ensure contractor has adequately restored temporary land.</p>				
2.13 Over Used Local Resources						
<p>i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.</p>	<p>i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.</p>	<p>Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern</p>	<p>Throughout construction period—at least once when work is near or in a community</p>	<p>Meeting note signed and dated</p>	<p>PMU</p>	<p>Supervision Consultant</p>
<p>2.14 Contractor Good Housekeeping Practices not Applied</p>	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection program must be established</p> <p>iii. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and</p>	<p>Inspect all camp operations including worker housing and all waste management procedures</p>	<p>Throughout the construction period while work camps are in operation</p>	<p>Inspection note re findings, dated and signed</p>	<p>PMU</p>	<p>Supervision Consultant</p>

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	clean up of any spills or hazardous materials plus any necessary re-vegetation.					
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released	Obtain completion report and review for compliance	1 month before the end of the construction period	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	WSD	WSD
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

Initial Environmental Examination

P46377-PAK
TA 8406-PAK
July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Jacobabad to Rotadero Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

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Initial Environmental Examination

May 2015

TA 8406-PAK: Provincial Road Improvement Program:
Rehabilitation of the Jacobabad to Ratodero Road

Prepared by the Engineering Consultant International Pvt. Ltd (ECIL) for the Sindh Works and Services Department and Asian Development Bank.

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
CO	mg/m ³	Carbon monoxide
dBA	dB	Decibels (A measure of audible noise)
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
GRM		Grievance Redress Mechanism
GFP		Grievance Focal Person
IEE		Initial Environmental Examination
IRI		International roughness index
km		kilometres
Km/h		Kilometres per hour
m		metres
mm		millimetres (1/1000 metre)
masl		metres above sea level
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PEPA		Pakistan Environmental Protection Agency
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
SNEQS		Sindh National Environmental Quality Standards
SO ₂		Sulphur dioxide
SPS 2009		ADB's 2009 Safeguard Policy Statement
SSEMP		Site Specific EMP
TPM	micrograms /m ³	Suspended particulate matter, with particles ≥ 10 microns in size, and a danger to lungs. Also referred to as PM ₁₀
S-EPA		Sindh Environment Protection Agency

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 2, the 55 km Jacobabad to Ratodero Road the road will improve the linkage between Jacobabad, and Larkana, Shahdaskot, Sibi, Kandhkot. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and

the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WSD and any contractors on the EMP and the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

Any mosques, graveyards and other cultural sites that could potentially be affected by the work were identified. In the event, only one mosque, located at chainage 4+200-4+300, will be marginally affected. There should be no damage to other cultural sites or to any archaeological sites. Only five trees need to be cut, while trees on the embankments need not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are minor and able

to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP is Rs 30,956,255 for the contractor for WSD including a 10% contingency.

I. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this aim, GoS requested a loan from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads.
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing a new asphaltic concrete base and riding surface. Other sections will be rehabilitated; involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated ([Table 1](#)) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as

Table 1 List of Selected Roads

Road sections	Km	Km under ADB loan
Kandhkot – Jacobabad (01)	77	77
Jacobabad – Ratodero (02)	55	32
Khyber – Sanghar (03)	64	64
Sanghar – Mirpur Khas (04)	64	64
TM Khan – Badin (05)	67	67
Mirwah – Naukot (06)	64	53
Total	391	238

4. A separate IEE has been prepared for each road. This IEE is for Jacobabad to Ratodero (road number 2).

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner

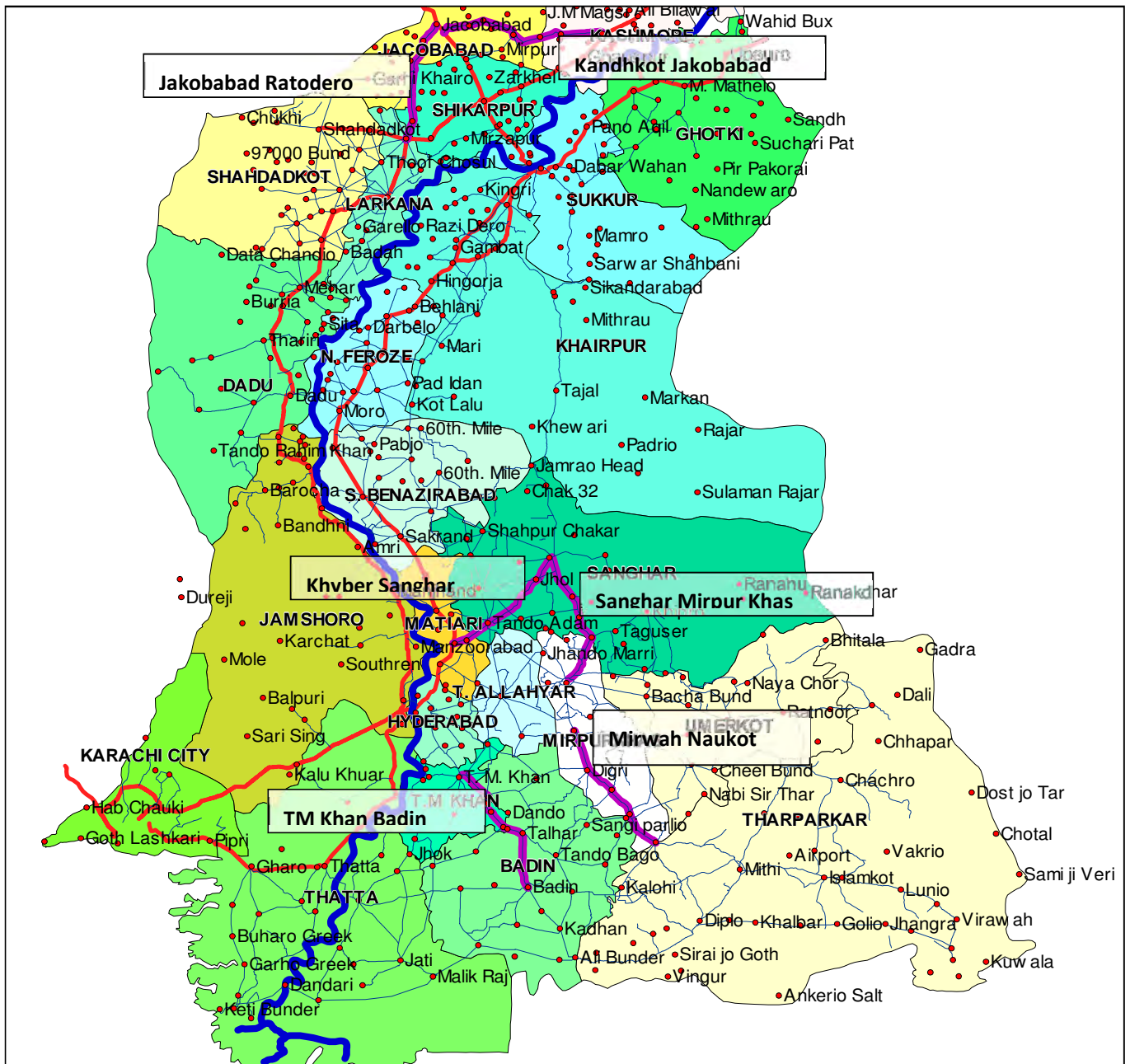


Figure 1 Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational.. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (S-EPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who must ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there will be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road's physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project's corridor of impact – generally considered to extend 15m each side of the carriageway centreline – was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.
13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Legislative and regulatory requirements pertaining to the project were reviewed along with other available data and previous IEE/EIA studies conducted in the region. Studies reviewed included the following:
- Environmental Impact Assessment Study of Multi Tranche Financing Facility for National Highway Development Sector Investment Program Project-2, Sukkur to Jacobabad, Assisted by ADB
 - ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-Pak, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
 - Bi Annual Environmental Monitoring Reports for Larkana and Jacobabad 132KV Grid Stations January, 2014 Assisted by ADB.
 - National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
 - Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
 - Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.
 - Sindh Water Sector Improvement Program; Environmental Impact Assessment for works on Khipro and Mithrao Canal; A project of Sindh Irrigation and Drainage Authority; Pakistan; Volume; 1 September 2012.
15. In addition, the following web sites were reviewed and relevant information is included in this report.
- <http://www.meoweather.com> date visited: September 2014
 - www.pbs.gov.pk date visited: September 2014
-

- <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure, and action to either prevent or minimize negative effects, was identified and a monitoring requirement specified. These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.

18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter **Error! Reference source not found.** and Annex -1

II. PROJECT DESCRIPTION

A. Project Description

19. The project (road number 2) involves the reconstruction of provincial highways S13 and part of S11 (Jacobabad to Ratodero) between the district centre of Jacobabad and the administrative town centre of Ratodero. The road reconstructed of two provincial highways roads one is Jacobabad to Shahdaskot road (S11) from Jacobabad to Sheranpur section and other Sheranpur to Ratodero road (S13). When reconstruction is complete, the road will improve the linkage between Jacobabad, and Larkana, Shahdaskot, Sibi, Kandhkot.

B. Existing Condition of Project Road

20. The road surface is mostly in good condition in section of S11, from Jacobabad to Garhi khairo bypass but the road needs strengthening to cope with expected loads. An estimated (35) km near the Garhi khairo bypass to Ratodero city end, has failed and requires urgent renewal. A typical cross section also showing the existing road is shown as **Error! Reference source not found..**

C. Re-Construction & Rehabilitation to be Undertaken

1. Scope of Work

21. The project design has allowed for the entire length of the Jacobabad to Ratodero road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides for either or both actions to be taken. A full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations are included in the EMP
22. The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centre line. Both rehabilitation and reconstruction within the existing carriageway are category B works.

2. Reconstruction of existing carriageway

23. Reconstruction work involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.

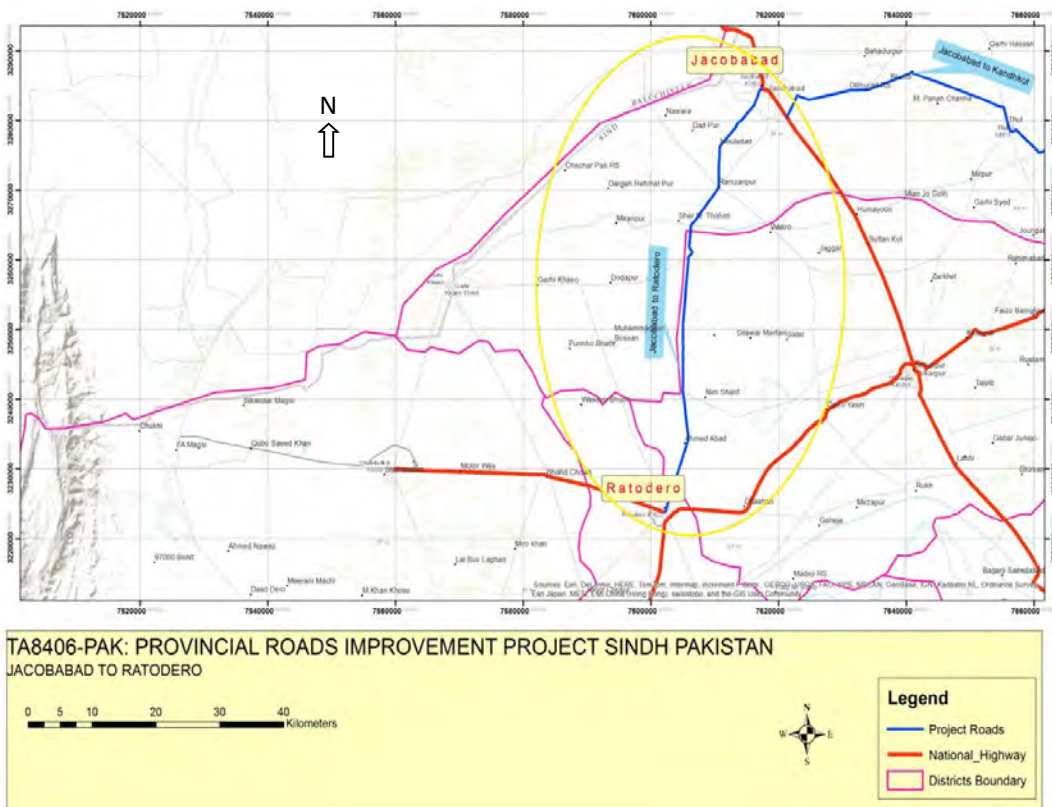


Figure 2 Pakistan showing the location of the Project road

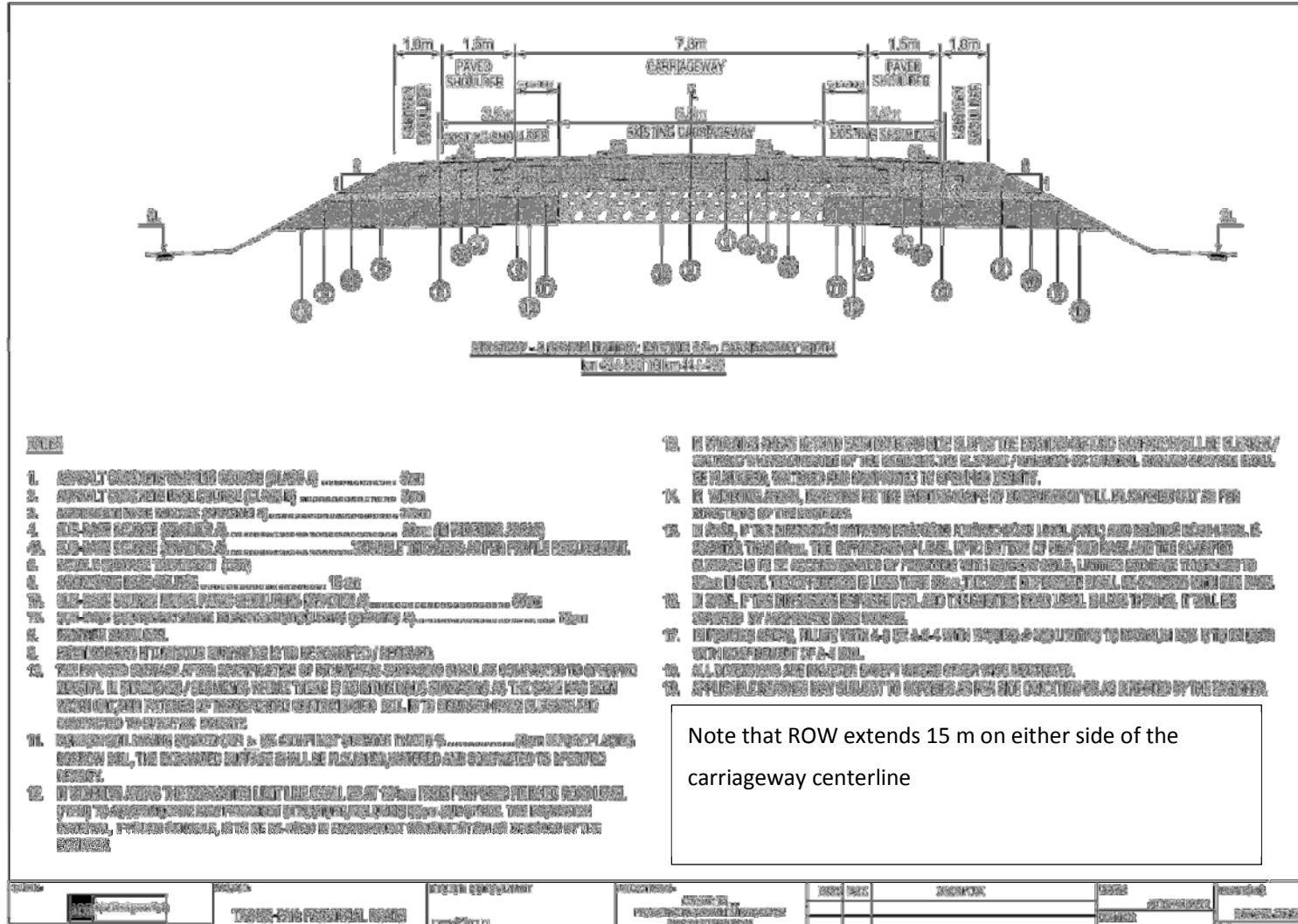


Figure 3 Typical Cross Section

24. The main steps involved in reconstructing a section of road are:

- i. Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- ii. Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- iii. Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- iv. Use recycled or new crushed aggregate to provide a compacted aggregate base course over the width of the pavement (depth may vary as per profile)
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

3. Rehabilitation (Overlay)

25. Rehabilitation involves scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses. The key steps are:

- i. Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- ii. Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- iii. Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- iv. Scarify existing bituminous surfacing. Material removed is to be transported to an approved disposal site.
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

4. Rectification of Bridges

26. The process for bridges is as follows:

- Preparation of a complete bridge inventory
- Cleaning of all concrete surfaces including girders and transoms.
- Providing plaster to guardrails and posts including curbs wherever necessary.
- Cleaning expansion joints.
- Repairing training works wherever necessary
- New Deck construction (as & where required depending upon the deteriorated condition of Deck slab).

27. Only one bridge requires repair, this is located at chainage ((21+100)) and one bridge at chainage (47+960) need to be replaced.

5. Reconstruction and Rehabilitation of Culverts

28. Many of the culverts are blocked, damaged or are inadequate. Where the road is to be widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary diversion or to close one side of the road at a time and institute traffic controls. Restitution of the road will follow the steps outlined in section II.C.2 above. It may also be necessary to provide a temporary diversion for the water channel. Ideally the work will be done in dry season when water flows are minimal.

29. The steps for repairing or replacing culverts is as follows:

- All vegetation shall be removed from culvert inlet and outlet up to 5m, from either side.
- Where water channels have to be diverted or construction, this will be done during the dry season and new culverts will be placed on a 30 cm thick sand cushion.
- Where culverts needs extension, provide a 300 mm sand cushion and place lean concrete as a base,
- New reinforced concrete slab culvert to be provided as per the drawings, Re decking of culverts as and where applicable
- The masonry side walls shall be deep pointed including replacement of parts of masonry which has deteriorated and re-laid with good quality bricks and mortar.
- In the base slab all pitting shall be rectified by providing bonding agent and a 75mm thick concrete cover with 10mm diameter bars placed at 250mm centres. Anchor bars shall be drilled into the base slab. The anchor bars shall

be 13 mm diameter placed 600 mm centres and drilled 150mm into the base slab.

- The top slab shall be examined for any cracks which shall be repaired with epoxy injection.
- Where the concrete cover has broken and steel reinforcing is exposed, the area shall be marked and all rusted reinforcement shall be removed and replaced by better quality new steel of the same size and area and nailed to the concrete surface. In such areas, concrete shall be chipped to at least 75mm in thickness, a bonding agent shall be applied and concrete shall be applied in the form of plaster. Steel rods 15mm in diameter shall be drilled into the old concrete at 450mm centres and grouted.
- After rectification work is carried out all the areas shall be coated with a polymer reinforced cementitious waterproofing compound.
- The roadway and shoulders shall be restored following section II.C.2 above.

D. Construction Materials

30. Construction materials require transportation from the source to the work site as follows.
31. **Stone**- Stone for base course is available in abundance at Shadi Shaheed quarry Khairpur, which lies at a distance of 120 Km from Larkana Khairpur Bridge and N155 starts of the road at Larkana. It can be supplemented from Ubban Shah Quarry which is at a distance of 125 km from Ratodero.
32. **Bitumen**-The National Refinery Karachi (480 km from Ratodero) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source.
33. **Cement** - There is one cement factory in the vicinity of project road, namely Rohri Cement Factory in Sukkur (80 km from Ratodero), Zeal Pak Cement in Hyderabad, Lucky Cement Limited and Power Cement Factory in Nooriabad are in range of (300-390 km from Ratodero).
34. **Sand**- Good quality of sand is available at Kalri Dudanko quarry which is 15 Km beyond Sukkur as well as from Shadi Shaheed which is in the vicinity of Khairpur (120 km from Ratodero) There are other quarry sites available in the sub-project area which can be utilized. These are all within 125 km of where road maintenance and rehabilitation will take place.
35. **Steel Reinforcement (Rebar)** The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:

- Mehran Mills
- Islam Mills
- Hyderabad Mills

36. The distance from Hyderabad mills to Ratodero, the project start location, is about 300 kilometres.

37. **Aggregate and Concrete** - Crushed stone aggregate for concrete is available in Ubban Shah Quarry Khairpur and Kalri Dudanko all between 80-130 kilometres range at Khairpur and Sukkur.

- Crushed Aggregate for Asphalt Concrete Ubban Shah Quarry, Khairpur
- Sub Base (Murom) Ubban Shah Quarry, Khairpur
- Aggregate Base Course Ubban Shah Quarry, Khairpur
- River Sand from Indus River Basin

38. **Bricks**- The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.

39. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation & Drainage Authority. While the amount of water required is considerable, it should be negligible when compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 10 to 16 meters.

40. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.

Option 1: Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.

Option 2: Waste material can be used to refill borrow pits and covered with topsoil¹

Option 3: Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.

¹ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

41. The total quantity of material to be disposed of is estimated to be 13,764 m³.

III. DESCRIPTION OF ENVIRONMENT

42. The description of the environment of the project roads requires baseline data on the following:

- Physical Environment
- Ecological Resources
- Socioeconomic Environment

A. Physical Environment

1. Topography

43. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South. The Jacobabad to Ratodero road lies in the central alluvial plain.

2. Soils

44. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in the project area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread, but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.

45. The alluvial deposits date back to the time when the Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

46. The seasons in Pakistan can be best classified as

- Winter, from December to March
- Pre-monsoon (summer), April and May
- Monsoon, from June to September
- Post-monsoon, from October to November
- Summer season runs from April until October and winter runs from November to March.

² site visited on dated 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on dated 18.01.2015

47. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, but largely escapes the influence of both, resulting in a rainfall of only 150 to 180 mm per year.

48. For the Jacobabad to Ratodero road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in [Table 2](#).

Table 2 Average Air Temperature and Precipitation in Jacobabad-Larkana road³

Month	Jacobabad			Larkana		Precipitation (mm)
	Temperature °C		Precipitation (mm)	Temperature °C		
	Maximum	Minimum		Maximum	Minimum	
January	30	0	0	32.3	0	16.5
February	34	2	6	36	5	2.7
March	42	-2.8	9	41.5	10	3
April	45.8	9.6	0	43.4	13	0.2
May	50	12.8	3	44.9	19.2	2.6
June	50	13	0	45	18.5	9.3
July	49	11.7	24	40	20	47.5
August	42	18	12	40	20	43.3
Sept.	55	15.3	3	42.1	17	4.3
October	39.7	0	0	42	11.8	6
November	42	-3.3	0	38.5	8.9	0.6
December	35.4	0	3	34.5	2.7	6.6

4. Air Quality and Noise

49. The road is located in a rural area and human activity is primarily related to agriculture, although there are some rice and flour mills. The major air quality issue is Carbon monoxide (CO). The CO level can exceed acceptable levels in the in Larkana district due to the vehicle source and incomplete combustion ([Table 3](#)). The situation is aggravated by human activity such as, old Rickshaw, old dump trucks and open burning of the municipal solid waste. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.

³<http://www.meoweather.com> site visited September 2014

50. Since WSD has not yet established its own environmental monitoring capacity, there are no air quality and traffic noise monitoring data available for existing roads in Sindh Province. The subproject road is located in the rural areas, human activity is mostly limited to farming a, however air quality data were taken from the Sindh data base found in Bi Annual Environmental monitoring reports of January 2014 for the 132 KV power substation at Jacobabad and 132KV substation at Larkana; Sampling point of Jacobabad Grid station is located at distance of 3km from the project road and Larkana Grid station is located at distance of 27 kilometre from project road ([Table 3](#)).

Table 3 Ambient Air Quality – Jacobabad-Ratodero Road ⁴

Parameter	Units	Sampling location		GoP Standards /NEQS
		Jacobabad (Grid station)	Larkana (Grid station)	
Particulate Matter (PM10)	mg/m ³	0.039	0.0632	0.150
Sulfur dioxide	mg/m ³	<0.02	<0.02	0.120
Oxides of nitrogen	mg/m ³	0.005	0.0053	0.080
Carbon monoxide	mg/m ³	4.02	6.57	5.00

51. Traffic volume is relatively low is shown in (Table 6) and the adjacent land use is primarily agricultural. Both road and ambient noise levels increase due to traffic jam because of people encroachment and worse road conditions when the project road enters into a town. ([Table 4](#))

Table 4 Noise intensity in medium-sized towns

Noise Intensity	Sampling Location		NEQS /GoP Standards	
	Abad Village ⁵ (Jacobabad)	Areja Village ⁶ (Larkana)	Day	Night
dBA	64	40	65	55

⁴ Bi Annual Environmental monitoring reports Larkana Grid Station and Jacobabad Grid Station January,2014

Units converted from ug/m³ and ppm to mg/Nm³

⁵ Abad Village is located at distance of 10 kilometer from the project road

⁶ Areja Village is located at distance of 25 kilometer from the project road

52. Noise data taken from two environmental assessment studies⁷.show that this areas background noise is within the acceptable range for transport corridors as defined in Pakistan.

5. Hydrology

53. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps in use. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies from 3 meters to 25 meters along the route. Larkana and Jacobabad district is irrigated by the canals from the Guddu and Sukkur barrage and rain water. However, other modes of land irrigation such as river water and tube wells are also used. The area being fed by Guddu and Sukkur is further divided in perennial and non-perennial system of irrigation. The irrigation network is mainly comprises Kirthar Canal, Rice Canal, and Beghari canal. There is one major canal, five minor tributaries and fifteen water courses crossed by the sub-project road. These water sources are the major source of drinking water as well as water for irrigation.

54. Excessive irrigation and seepage from canals has caused water logging and salinization problems near the canals in the project area. Recent floods have exacerbated this problem, since farmers have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface.

6. Seismicity

55. According to the seismic zone map of Pakistan, the Project Area lies in the zone where minor to moderate damage can occur as shown in [Figure 4](#)

⁷ Environmental Impact Assessment Study of Multi Tranche Financing Facility for National Highway Development Sector Investment Program Project-2, Sukkur to Jacobabad, Assisted by ADB and EIA for Larkana Industrial Estate

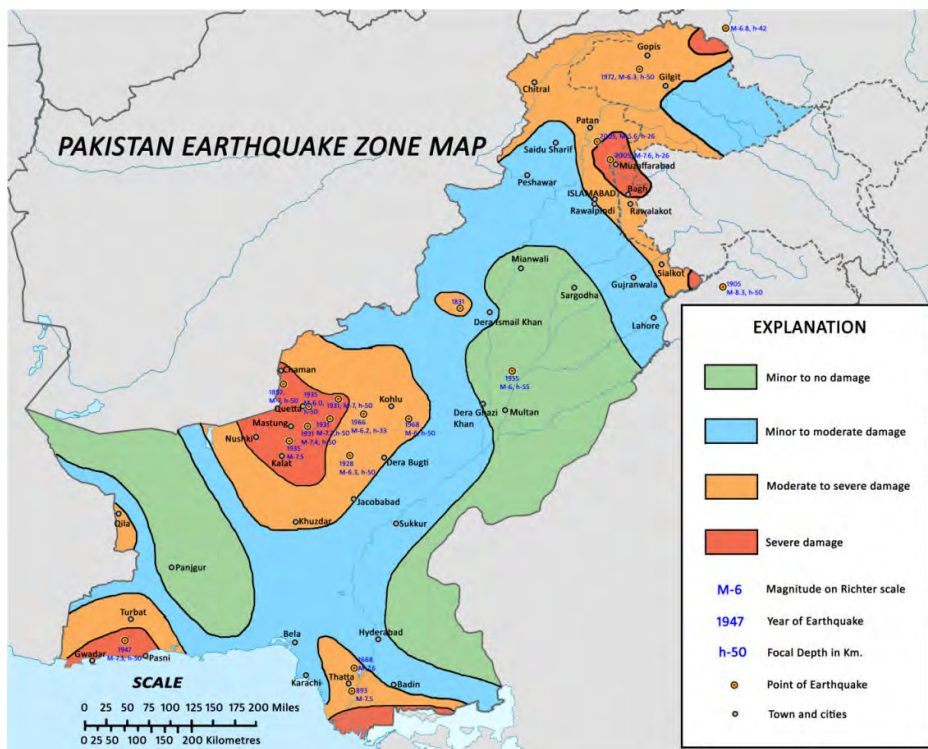


Figure 4 Pakistan Earthquake Zones

7. Archaeological and Cultural Resources

56. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.

57. Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Thirteen Mosques and Seven Graveyards were identified as being potentially affected by the proposed work on the Jacobabad to Ratodero road. A detailed inventory of the sites showing the approximate location of the structures is provided in [Table 5](#). By applying careful highway design most of potential impacts were avoided. Only one mosque will be marginally affected. However care will need to be taken during construction activity.

Table 5 List of Archaeological and Cultural Resources impinging on the ROW

Distance from RoW (Km)	0-10			11-20			21-30			31-40			41-50			51-60			61-70		
	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G
Count	1	0	1	1	0	1	1	0	2	5	0	2	3	0	1	2	0	0	0	0	0
Total	Mosque =13 and Graveyards=7																				

B. Ecological Resources

58. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

59. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.

60. The dominant trees in upper Sindh project area are Main trees in the Project Area are Acacia Nilotica (Keekar), Eucalyptus camaldulensis (Safaida), Phoenix dactylifera (Date palm), Dalbergia sissoo (Shisham). Azadirachta indica (Neem), Salvadora oleoides (Peelu) and Ficus religiosa (Peepal).

61. Of more concern would be damage to old plantations of Azadirachta indica (Neem), Albizia lebbek (Shrin), Ficus religiosa (Peepal), Acacia nilotica (Babul), Cordia myxa (Lasura) and Ficus benghalensis (Borh), and recent plantation of Cornucopias. These trees have significant medicinal value and are important culturally and create valuable shade in a very hot climate.

62. Among the grasses; Lumb (Arislida depressa), Chemmer (Eleusine compressa), Gorkha (Lasiurus indicus) and Kana (Saccharum bengalensis) are found in the Project Area. Koondor Dib (Typha augustata) is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

63. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.

64. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

65. Reptiles include snakes such as cobra (Naja naja), rattlesnakes (Crotalus horridus) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (Varanus sp.), spiny tailed lizard (Uromastix

hardwickii) and fringed toed lizard (*Acanthodactylus contoris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

66. Important bird species found in the project area are the common crow (*Corvus brachyrhynchos*), common mynah (*Acridotheres tristis*), house sparrow (*Passer domesticus*) and common teal (*Anas crecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdix perdix* and *Melanoperdix niger*), though present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coracias benghalensis*), crested lark (*Galerida cristata*), vultures (several varieties) and quail. White heron (*Ardea alba*) and black heron (*Egretta ardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconia ciconia*), white pelican (*Pelecanus onocrotalus*), little brown dove (*Spilopelia senegalensis*) and white throated king fisher (*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

67. Ecosystems include protected areas such as wildlife sanctuaries, national parks and game reserves. Two wild life sanctuaries and four wetlands which are found in the Jacobabad and Larkana districts, but these all more than 45 km from the RoW of the Jacobabad-Ratodero Road and therefore are not impacted.
68. The nearest game reserves area is the Indus Dolphin Reserve area some at 90 Kilometres north-east and the Nara Desert Reserve some 200 kilometres north-east of the road corridor.
69. The nearest wetland is the Lung Lake some at 50 kilometres in south-west of road RoW. It is an important wetland of Sindh, located in district Larkana and declared a Wildlife Sanctuary in 1982. The lake is covered an area of 39.25 ha. Continuous efforts of Sindh Wildlife Department for habitat management and its improvement have made the lake an ideal refuge for migratory waterfowl in the wintering months. Every year, the lake receives a large variety of migratory waterfowl because of its location on the Indus flyway. It is considered as the best wetland in northern Sindh. Tehelake is in the Indus flood plain but now is fed mostly by tube well and a small canal flows. An earthen embankment on the periphery forms boundaries of the lake, which normally dries out in summer when the temperature varies between 38-48°C.

F. Socio-Economic Environment

1. Road Transport

70. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. These data show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in [Table 6](#).

Table 6 Twenty four hour Traffic count (number of vehicles) along subproject road

Section	Motorcycle	Car/ 4wd	Rick shaw	Vans/ PU	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
Jacobabad - S.M.Taheim	1581	180	253	275	23	9	57	7	0	8	78	2468
S.M.Taheim - Ratodero	2267	675	218	146	22	2	54	4	0	1	140	3525

71. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons. The Consultant met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to include approximately 350 heavy vehicles a day (mainly 2 axle trucks and tractor-trailers); twice the number surveyed in June.

2. Structures Affected

72. During the topographic survey a small number of structures were found in the Jacobabad to Ratodero road RoW. None of these have encroached on the pavement, but (one cultural and two commercial) structures within the paved or unpaved shoulders (including those shown in Table 5). These encroachments are illegal but if people are moved or cultivated land is taken, compensation under SPS 2009 and ADB's Involuntary Resettlement Guidelines is nevertheless required. Resettlement is the subject of a separate land acquisition and resettlement plan (LARP).

3. Drinking Water

73. During the survey it was learnt that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location, with

areas close to irrigational canals having comparatively better quality water while water in some other areas is saline.

4. Industrial and Commercial Activities

74. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, Cotton ginning and flour mills. There are also some brick kilns.

5. Employment and Income Sources in Project Area

75. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

76. Agricultural lands are owned by landlords and farmers work for a share of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves. They graze cattle and grow vegetables for food.

77. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.

78. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.

79. Agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers, small business, and as labourers in the cotton and rice industry and 5% are in government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.⁸

⁸ Project of Sindh irrigation and Drainage Authority EIA report for Works on Khipro and Mithrao Canal; September 2012

6. Demography

80. The project road is located in the Jacobabad and Larkana district, and the demography is diverse ([Table 7](#)).

Table 7 Demography of the Subproject road Jacobabad to Ratodero⁹

Factor	Jacobabad	Larkana
Area sq.kms	5,278	7,423
Population (Persons)	1,425,572pers	1,927,066pers
<ul style="list-style-type: none"> • Male • Female 	744,014(52.19%) 681,558(47.81%)	993,576(51.56%) 933,576(48.44%)
Sex ratio (males per 100 females)	109.2	106.4
Population Density	270.1persq.k	259.6persq.km
<ul style="list-style-type: none"> • Urban Population • Rural Population 	347,391(24.37%) 1,078,181(75.63%)	557,012(28.90%) 1,370,054(71.09%)
Avg Household size	5.6	5.9
Literacy ratio 10+	23.7%	34.9%
<ul style="list-style-type: none"> • Male • Female 	34.08% 12.30	48.56% 20.48%

81. Tribal people include Jamali, Khoso, Kandrani, Bughio, Jatoi, Mahar, Abro, Domki, Leghari, Lashari, Syed, Shaikh, Soomro, Jakhrani, Bhutto, Bheel. Sindhi is commonly spoken in the majority of the communities in the project area. However, Balochi, Urdu, and Siraiki languages are also spoken and understood as local languages.

⁹ www.pbs.gov.pk
<http://dearsir.pk>

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design and Pre-Construction Phase Impacts

1. Lack of Environmental Capacity

a) Description

82. During the field surveys it became clear that the provincial and district government officials who will be charged with overseeing the construction are unfamiliar with the environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented is low.

b) Mitigation Measure

83. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use

2. Lack of Integration of IEE/EMP Requirements into Construction Bid Documents

a) Description

84. The Bidding documents should reflect the requirement to select a qualified and experienced contractor. Bidding documents has greater emphasis on the methodology on the protection with regards to environmental and social worksite management. The bidder's environmental, social and safety methodology shows material deviation, reservation or omission towards environmental, social and safety specification.

b) Mitigation Measures

85. PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.

3. Loss of Vegetation and Trees

a) Description

86. There are various trees located on the both sides of the Jacobabad to Ratodero road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to meet road safety standards. There will be loss of vegetation in some

locations, but always within the road ROW According to the LARP report section 1 Table 1.1 five mature trees will be cut to pave the way for the required width of carriageway

b) Mitigation Measures

87. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every tree cut down ,and which is more than 10cm Diameter Breast Height (DBH) .

4. Top Soil Erosion

a) Description

88. The top soil of RoW needs to excavate for reconstruction of the proposed project structure. It will erode and cause disruption local community and vehicle traveller as soil particles displaced and transported easily in air, water and may affect wide range of community assets.

b) Mitigation Measures

89. Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.

5. Disturbance to Archaeological and Cultural Sites

a) Description

90. There is no archaeological site found in the Jacobabad-Ratodero road, however one courtyard of mosque located at chainage 4+200-4+300 will be removed.

b) Mitigation Measures

91. Prior to the start of any demolition work, mosque officials will be consulted and a mutually acceptable set of steps implemented. Contractor will also take prior approval from IA and ADB. The Mosque will be protected via concrete guard rail to avoid any disturbance to the worshipers. The demolished courtyard will be reconstructed as road construction activities will move forward from Mosque area. This construction will be completed only after consultation with mosque and community officials, but immediately after the work in that area has been completed.

6. Material Haul Routes

a) Description

92. Hauling of material have significant impacts on the community, public safety, traffic congestion, air quality and lifespan of the town road ways.

b) Mitigation Measures

93. Construction vehicles hauling materials along urban roads and anywhere where there are road side residence will be limited and the WSD will establish a route plan to minimize this disruption.

7. Consultation Plan with affected roadside landowners

a) Description

94. The road side and landowner may come across in relation to the road side schedule in installation of new fence, rubbish dumping, weed control and feral animal control which may cause disruption to the road side landowners.

b) Mitigation Measures

95. Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.

8. Contractor's Environmental safeguards Capacity

a) Description

96. The responsibilities of safeguards unit reviews and finalize the document relating to environmental issues. Contractor with less capacity of safeguards do not comply with workplace environmental, social and safety regulations.

b) Mitigation Measures

97. Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

98. A small increase in particulate matter (dust) is expected within construction air shed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

99. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii) spraying of water on unsealed roads and work areas within villages and past houses located close to the road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

100. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plant, require cement and dry sand a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust in emitted when bagged cement is loaded manually into the batch plant hopper, as well as with the conveyor system bringing the materials to the plant.

b) Mitigation Measure

101. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted

3. Topsoil Erosion

a) Description

102. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

103. Excavation of earth fill will be limited to an appropriate depth of 20cm. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored

and then replaced after removal of borrow material. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

104. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

105. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with twelve months of the start of the work. Secondly no construction vehicles will be left idling for more than two minutes.

5. Disposal of Spoil and Solid Waste

a) Description

106. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.

a) Mitigation Measures

107. The asphalt and base course removed from the existing road will be recycled¹⁰. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverised, spread on access roads and compacted.
108. The contractor, together with the Town Municipal Administration (TMA) and District Administration of Jacobabad, Ratodero and Larkana will identify dumping locations for construction debris and non-hazardous solid waste.

¹⁰ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

109. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

6. Noise and Vibration

a) Description

110. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.
111. Vibration will occur during compaction when vibratory rollers are used to compact subgrade materials. This is unlikely to cause permanent damage.

b) Mitigation Measures

112. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured as per Sindh National Environmental Quality Standards limits.
- 113.

7. Quarry /Borrow Material

a) Description

114. Transport of construction material (aggregate and fill) may raise environmental and social issues with the possibility of damage to bridges and pavements if vehicles are overloaded.
115. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

116. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.

117. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Borrow material must be taken only with the consent of the land owner and if the contractor is found to be in violation, will be fined in addition to having to completely rehabilitate and re-vegetate the site(s).
118. The contractor will ensure that the use of productive and agriculture land and the loss of vegetation is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

119. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.
120. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.
121. During rehabilitation work on culverts and bridges the canals and water courses crossed the Jacobabad to Ratodero road, could become polluted by accidental discharge of cement and other chemicals like epoxy and paints.

b) Mitigation Measures

122. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA approved site. New soil should be brought in as required so that the ground surface is re-established.
123. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.
124. Water channels must be diverted properly and a protection mechanism provided. Alternatively construction should be undertaken during the dry season.
125. Water channels will be monitored for their quality against "irrigation water quality standards" of Water and Power Development Authority, WAPDA. Ground water quality will be monitored against National Drinking water quality standards

9. Damage / disturbance to Utilities Services

a) Description

126. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

127. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance

a) Description

128. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

129. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

130. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitoes and rodents.
131. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.
132. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.
133. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if

breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

134. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or let enter streams where it can affect downstream water quality, aquatic environments and human health.
135. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.
136. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area where cement dust is in the air.
137. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to insure compliance with the requirement of dust masks.

12. Interruption/ Contamination of Water channels

a) Description

138. There are twenty one watercourses crossing the project road: details were given in table 5. Repair or replacement of the crossing will often require temporary diversion of, or work within, the watercourse. This could affect the water supply to agriculture land of communities living nearby, and could lead to contamination.
139. Temporary traffic diversions disrupt and can be a danger to traffic.

b) Mitigation Measure

140. Where water crossings are being repaired. The water channel should be diverted or a protection mechanism provided to avoid contamination. Where possible, construction will be made in dry season.
141. The contractor should provide an adequate sized diversion so that there shall be no disturbance to water flows of canal /water course.

142. A traffic management plan shall be provided by the contractor. Signage and lighting may also be provided to reduce the likelihood of accidents.
143. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed.

13. Burden on Local Resources

a) Description

144. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife. The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

145. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

14. Inadequate Camp Site Good Housekeeping

a) Description

146. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

147. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.
- Train work force in storage and handling of materials
 - Fire fighting
 - Camp sewage will be treated in soaking pit and garbage management, by provision of EPA-compliant means of disposal.
148. Contractor will prepare as part of site specific EMP following which will be approved from EA and final approval will be sought form ADB.

- Traffic management plan
- Waste management plan
- Borrow site management plan
- Camp site management plan
- Mosque relocation plan / approval

C. Operation Phase Impacts

149. Most of the impacts at the operation stage are positive and do not require mitigation. These include:

- Improved access to markets
- Reduced travel times
- Lower vehicle operating costs
- Reduced dust

150. However there are some negative impacts and these are listed in the following sections.

1. Lack of Environmental Safeguards

a) Description

151. While the proposed project will be completed with follow of environmental safeguards of the EMP. The contractor has to ensure the action taken during all stages with compliance of this EMP.

b) Mitigation Measure

152. The contractor, will provide mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released

2. Increased Traffic Volumes

a) Description

153. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

154. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

3. Increased Risk of Accidents

a) Description

155. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.
156. The road design has had to balance the requirements of SPS 2009 to minimise displacement of encroachers and land acquisition against road safety

b) Mitigation Measures

157. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds
158. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.
159. Traffic police should be trained to more consistently enforce road rules.
160. One of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties should be sought.

V. GRIEVANCE REDRESS MECHANISM

A. Organisation

161. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Jacobabad to Ratodero road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.
162. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, Grievance Focal Person (GFO) who can be Community Leader, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.
163. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with appointed GFO prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessible to potentially affected persons through GFO.
164. Contact details will be distributed by the GRO to GFO in the appropriate local language, for posting in the village office.
165. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

166. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.
167. The first step ([Figure 5](#)) on receiving a grievance will be for the GRO to refer the matter to the contractor, who will be given one week to respond to the grievance.
168. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.

169. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.
170. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.
171. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:
- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
 - (ii) Updating the complaints database routinely;
 - (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
 - (iv) Collecting and submitting input for inclusion in progress reports for ADB.

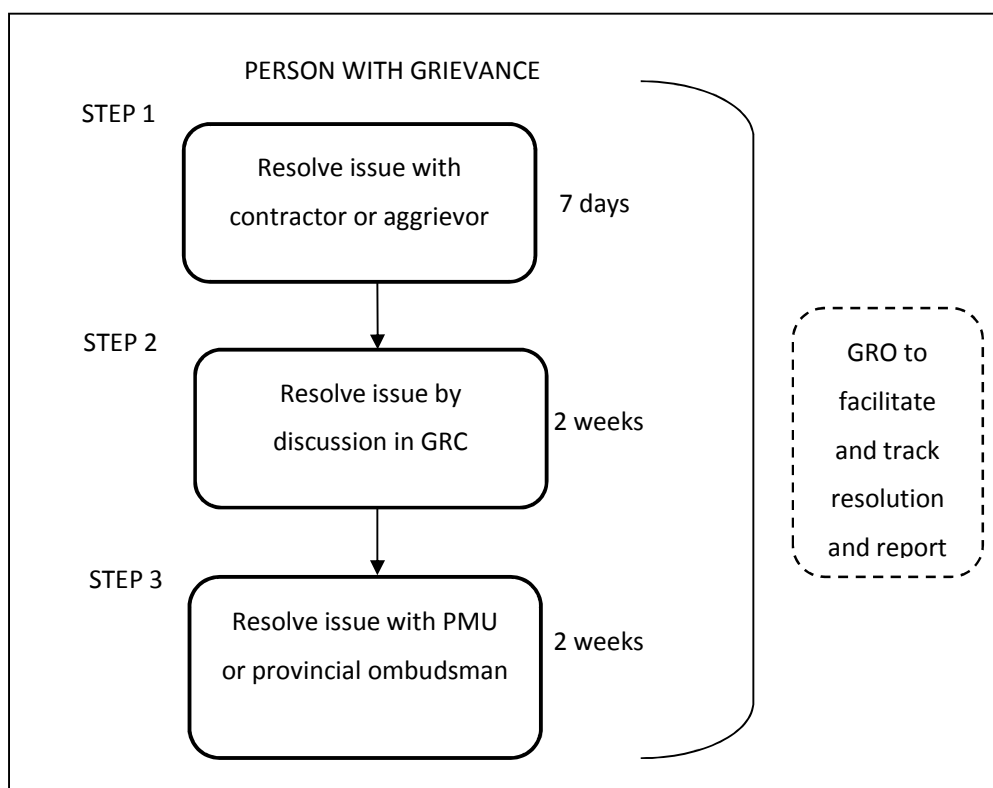


Figure 5. Steps of the Grievance Redress Process

VI. PUBLIC CONSULTATION

A. Objectives of Public Consultation

172. The overall objectives of the consultation process were as follows:
- To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
 - To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
 - To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
 - To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

173. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Assistant Commissioner Jacobabad and Assistant Director Development Larkana. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.
174. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

175. Community consultations consisted of formal and informal meetings at Jacobabad, Shernpur and Ratodero City. The meetings was conducted on dated 05.09.2014 to 07.09.2014 The consultation exercise was conducted in both Sindhi and Urdu languages. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.
176. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.
177. The people interviewed (Table 9) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

178. A matrix of concerns raised by community members was prepared ([Table 8](#)). The register of attendance is provided as [Table 9](#). Other people joined the discussions but declined to be identified. A pictorial record of the meetings is included as Annex 10. Note that residents in Jacobabad were asked about both this road and the Kandhkot –Jacobabad road. Where relevant, their comments may be included in both IEE. Other people joined in the discussions but declined to be identified.

Table 8: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns raised by community	Remarks
Road design	Storm drainage should be provided Jacobabad Ratodero road along provincial towns Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction / Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss in the urban areas during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	Construction will be programmed to minimise the length of disruption at any one point These issues will be addressed once road constructed

179. As appropriate these concerns have been incorporated into the EMP items and have been related to the appropriate WSD officers. They should be taken up by the safeguard specialist when appointed.

Table 9 General Public Interviewed During Public Consultation in relation to the Jacobabad to Ratodero Road

Name	Town/Village	Position /Occupation
Mr. Jahangir Ahmed Odho	Ratodero	Businessman
Mr. Sajjad Ali Odho	Ratodero	Private Job
Mr. Salman Ali	Ratodero	Farmer
Mr. Muhammad Mithal	Ratodero	Farmer
Mr. Mansoor Ali Dasti	Ratodero	Private Job
Mr. Sanallah	Jacobabad	Private Job
Mr. Khawand Ali Thaheem	Sheranpur	Govt. Employee
Mr. Moula Bux Thaheem	Sheranpur	Private Job
Mr. Shafeeq Odho	Sheranpur	Private Job
Mr. Sajjad Ali	Jacobabad	Farmer
Mr. AziziullahSoomro	Jacobabad	Farmer
Mr. Mehboob Ali	Jacobabad	Shopkeeper
Mr. Abdul Rasheed	Jacobabad	Worker
Mr. Muhammad Yaqoob	Jacobabad	Worker
Mr. Abdul Latif	Jacobabad	Driver
Mr. Salal Khan Jakhrani	Jacobabad	Engineer
Mr. Abdul Malik Jakhrani	Jacobabad	Engineer

3. Government Agencies

180. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices (**Error! Reference source not found.**). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below. Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in **Error! Reference source not found.** Pictures of the meetings are provided in Annex-2. Note that the Government offices at Jacobabad- Ratodero have jurisdiction over Jacobabad –Kandhkot road as well. Hence some consultation comments will be repeated between IEE.

a) Assistant Director Development Deputy Commissioner Office (Larkana)

181. A meeting for consultation was held with Mr. Zahid Gopang Assistant Director Development and with Assistant Executive Engineer Local Government on dated

04.09.2014. They raised the following points after welcoming the proposed project activity in their area of command. The meeting was held at the Office of the Deputy Commissioner Office Larkana and Town Municipal Office Ratodero. Their views are as under:

- A suitable alternate route should be made available during project execution, proper diversions shall be maintained with appropriate lighting and diversion signage's;
- Rice husking traffic will need to be managed in the area of Rice Mills.
- They raised concern related to construction activities, including air pollution (dust), traffic jam, and security.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the Jacobabad and Ratodero; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents contractor shall ensure the lighting and signage around the road diversions.
- Local people should get preferential treatment for the employment on the road project;

b) Chief Inspector Sanitation and Assistant Executive Engineer (Ratodero)

182. A meeting was held with, Mr Gian Chand. Chief Inspector Sanitation Mr. Shahzado Khokhar Assistant Executive Engineer Ratodero. The meeting was held Town Municipal Administrator Office Ratodero on dated 04.09.2014. After welcoming the project, he raised the following points.

- Generally they supported the project and were of the opinion that there is dire need of these kinds of project shall be started as soon as possible.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the Ratodero city; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents.
- He also suggested that during session of Sugar-cane crushing and rice husking traffic shall be managed in the areas.

c) Assistant Commissioner (Deputy Commissioner Office Jacobabad)

183. A meeting was held with, Mr Kashif Ali Assistant Commissioner Jacobabad. The meeting was held DC Office Jacobabad on dated 03.09.2014. After welcoming the project, he raised the following points

- They raised concern related to construction activities, including air pollution (dust), traffic jam, and security.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the Jacobabad and Ratodero; waste generated from the city is being dumped in the ditches at private lands upon their request.

- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in Jacobabad city.
- Rice husking traffic will need to be managed in the area of Rice Mills.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents contractor shall ensure the lighting and signage around the road diversions.
- Local people should get preferential treatment for the employment on the road project;

4. Non-Government Organizations

184. After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development, were consulted for this project during dated 04.09.2014 to 07.09.2014. Attendance lists of the stakeholders from the six NGOs consulted in the subproject was collated and reproduced in following were the major comments and suggestions;

- As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- Better road conditions will reduce the rate of accidents around the Rice husking mills
- Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.
- Clean Drinking water is not available to most of the resident of project area.

Table 10 List of Public and NGO Sector Stakeholders

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Giyan Chand	District Government	Town Officer Ratodero
Mr. Kashif Ali	District Government	Assistant Commissioner Jacobabad
Mr Shahzado Khokhar	TMO District Government	Assistant Executive Engineer Ratodero
Mr. AllahdinoAbro	TMO District Government	Office Superintendent Jacobabad
Mr. Khadim Hussain	NGO	(CEO) AAS Research Foundation Jacobabad
Mr. Muhammad Muslim	NGO	Executive Director Community Development Network Organization
Mr. Muhammad Jan Odho	NGO	(CEO) Community Development Fund
Mr. Panjal Khan Sangi	NGO	(CEO)Mehran Welfare Trust
Mr. Yasir Arfat	NGO	Regional Officer Trust welfare Organization
Ms. Seema	NGO	ERADA Trust

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

185. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects-monitoring mechanism, defined in the EMP's two action tables.

B. Environmental Management Plan for Jacobabad to Ratodero Road

186. The EMP, mitigation and monitoring tables for the Jacobabad to Ratodero road is included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs ([Table 11](#)) will be used to prepare a specific environmental safeguards section in the construction Bill Of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

187. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

188. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential negative impacts. The value of the environmental assessment process can be undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

189. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20m-25m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.

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190. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.
191. Site specific EMP (SSEMP) is to be prepared by the contractor based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.
192. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions.. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.
193. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

194. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which needs to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit (ESU) (a section within the PMU) will be mainly responsible for implementing the EMP.
195. There are fourteen Construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

3. Operating Phase

196. Operation period actions focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. All the work proposed is on existing roads and confined to the existing RoW. There will be some increase in the speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2). Speed limits will be monitored through traffic police as discussed earlier.
197. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:

- Less travelling time
- Quicker access to Market
- Fuel efficiency
- Less dust generation
- Safer journeys

C. Cost Estimates

198. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs and monitoring visits, training costs, etc. Table 11 shows the cost to be included in the BOQ items by the contractor.

Table 11 EMP Implementation and monitoring estimated cost for Contractor

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 200 persons)			490065	490065	980,130
Generators & Construction Machinery Noise Monitoring	7000	80	672,000	672,000	13,440,000
Drinking Water Quality Monitoring (During Const)	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	8000	200	1600,000	-----	1600,000
Personal Protective Equipments(for 200 persons approx) replacing every year)		200	1070000	1070000	2,140,000
Fire Fighting Equipments purchase and refilling		30	250,000	100,000	350,000
Health & Hygiene	--	--	738960	738960	1,477,920
Canal Monitoring (Pre-Const, During Const,) 1 month for pre-cons + 24 month of Construction	4,000	21	10510,000	10510,000	2100,000
Ambient Air Monitoring (Pre-Const, During Const,) Three Places (Two towns + Asphalt plant) on monthly basis	27000	36	972,000	972,000	1944,000

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Noise Monitoring (Pre-Const, During Const,) monthly basis at 15 sensitive locations	750	15	135,000	135000	270,000
Environmental Officer Salary	150,000	1	1800,000	1800,000	3,600,000
Subtotal					28,142,050
Contingency Cost 10%					2,814,205
Total					30,956,255

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

199. The Sindh provincial road improvement project will be coordinated by the Works and Services Department as an executing agency (EA) with a project management unit (PMU) established within WSD as Implementation Agency. The PMU will be self-sufficient to monitor the environment related issues.

200. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

201. The Project Management consultant (PMC) will support all Deputy Directors and PMU for project development. The PMC's environment experts will support the ESU in ensuring that project roads comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 ([Table 12.](#))

Table 12 Implementation Organisation for Road Reconstruction and Rehabilitation

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International ECIL
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

202. The ESU will, with assistance from of the PMC environmental specialist:

- Prepare environmental screening checklists;

- Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
 - Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
 - Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
 - Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors;
 - Ensure that the required environmental training is provided to the staff concerned;
203. Contractor will hire two full time persons to address the environmental safeguards; Environmental Engineer's responsibilities will include;
- Prepare Site specific EMP as per generic EMP of this road.
 - Monitor the work and undertaken the monthly reporting.
 - Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
 - Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
 - Coordinate with PMU Environment specialist to conduct site visits.
 - Impart trainings as per schedule.
 - Prepare monthly environmental monitoring report
204. Environment inspector responsibilities will include;
- Conduct day to day Site inspection activities for any non-compliance
 - Conduct environmental monitoring activities through certified environmental laboratory.
205. ADB's responsibility will be to review IEEs as a basis for the approval of the subproject.

3. Monitoring and Reporting

206. Following section describes monitoring and reporting frequencies and responsibilities;
- a) Implementing Agency**
- The IA's Environmental Safeguards Unit will prepare a compliance monitoring checklist, based on the EMP and brief Environment Engineer of the Contractor on its use and implementation schedule. The checklist will be completed monthly.
 - Carry out field visits for HSE compliance monitoring on quarterly basis
 - The Implementing agency will use the compliance checklist reports, plus a semi-annual audit of the work as the bulk of the content of the semi-annual construction monitoring report to ADB..

b) Project Management Consultants

- Ensure the compliance monitoring is being carried out monthly, quarterly and semi annually during the construction period.
- If non compliance is recorded, conduct review meetings with Contractor to address the non-compliance.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, defining what mitigative actions have been undertaken and where this work was done.
- Conduct the Environmental Monitoring (Air, Drinking water Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in the EMP ([Table 130](#)).

Table 13 Monitoring and reporting frequencies

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
1.	Environmental monitoring plan for Canal Water Monitoring						
a	Pre-Construction	Twenty three water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Once	WSD	PMU
b	Construction	Thirty three water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Monthly	Contractor Environment Engineer	Supervision Consultant
2.	Environmental monitoring plan for Drinking Water						
a	During Construction	Campsite	Biological Parameters	E-Coli, fecal coli form, Total Coli form	Quarterly	Contractor Environment Engineer	Supervision Consultant
b	During Construction	Campsite	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Quarterly	Contractor Environment Engineer	Supervision Consultant
c	During Construction	Campsite	Chemical Parameters	Chloride, Fluoride, Nitrate, Nitrite, Pb, Zn.	Quarterly	Contractor Environment Engineer	Supervision Consultant
3.	Environmental monitoring plan for Ambient Noise						
a	Pre-Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Once	WSD	PMU
b	During Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Monthly	Contractor Environment Engineer	Supervision Consultant

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
4.	Environmental monitoring plan for Air Emission						
a	During Construction	Campsite	Construction Machinery & Generators	CO/CO ₂ , SO ₂ , NO _x , PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant
5.	Environmental monitoring plan for Ambient Air						
a	Pre-Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Once	WSD	PMU
b	Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant

d) ADB

- Review the biannual monitoring report and follow up all outstanding issues.
- Approve any proposed changes to the management plans or procedures

VIII. CONCLUSIONS AND RECOMMENDATIONS

A. Principal Findings

207. This IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services department. This IEE is in respect of the Jacobabad to Ratodero road.
208. The proposed rehabilitation/reconstruction of the Jacobabad to Ratodero road will have very little environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites or on fauna or flora. The environmental category is 'B'. There is a minimal requirement for resettlement of illegal encroachers; this is being addressed in a separate LARP.
209. The following are the main issues identified and concerns raised during the study:
- The project road is in predominantly poor condition with broken down shoulders rutted asphalt surfaces, deep potholes, etc., and travelling time is around double the time that would be expected for a road in good condition;
 - The road embankment is eroded in some places;
 - There are mosques and graveyards are impinging to the ROW of the project road Courtyard of one mosque will be removed, this will be reconstructed.
 - There are twenty one major and minor canals and waterways crossing the road, requiring special care during construction works, including diversions that do not restrict flow or change its destination.
 - There is no protected sites or forests within 10km of n Jacobabad and Ratodero road RoW

B. Conclusion

210. The improvement of the Jacobabad to Ratodero road, part of the Provincial Road Improvement Project of the Government of Sindh, is limited to road reconstruction within the existing right of way. It is therefore likely to have only limited impact of a temporary nature and short duration. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
211. Provided the EMP is followed, there should be no damage to cultural and archaeological sites. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by concerned agencies, including Contractor, Environment Specialist ES (PMC) and PMU-W&S Department. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.
212. This IEE study concludes that the proposed pilot road project will not lead to significant adverse environmental and social impacts of such nature or magnitude that would require a more detailed report in the form of an EIA. Additionally careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.
213. The project has been discussed with local people, government officials and NGO. The consultations elicited general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust. There

was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

214. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.
215. The following recommendations are carried over from the text:
- Environmental monitoring shall be carried out by the IA and contractor in compliance with the EMP to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
 - The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
 - Trees located on the embankments will not be disturbed.
 - Asphalt plant shall be located at least two kilometres from settlements
 - Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
 - Excavation of earth fill will be limited to an appropriate depth of 20cm.
 - Canals and other water resources will be closely monitored to ensure no contamination occurs due to project related activities
 - A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
 - Health and safety plans will be prepared.
 - Construction work shall not hinder local people's access to nearby facilities.
 - SSEMP will be developed by the contractor, reviewed by the PMC, approved by IA and final approval from ADB. Contractor will not able to start the construction till the SSEMP is not approved.
 - An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
 - A grievance redress mechanism will be implemented by the contractor to ensure that community complains are addressed and recorded.

Annex 1

Table 14 Environmental Management Plan: Environmental Mitigation Table
(Emit) and Environmental Monitoring Table (EmoT)

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for Jacobad to Ratodero road	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	Mosque officials shall be consulted before removing of courtyard; Protection through guard rail will be provided to mosque. The budgetary cost of reconstruction of is mentioned in the LARP report table ES-3	During Planning phase in parallel with preparation of bid documents	At following chainage will be removed and reconstructed i. 4+200-4+300	WSD	Supervision Consultant
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	NA	WSD	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	around the construction work.				
1.8. Contractor's Environmental Safeguards Capacity	Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Plan to be provided the Consulting Engineer and PMU prior to start of work	WSD	WSD	Supervision Consultant
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted				
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be minimised by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, iv. Equipment such as the diesel generator will be included in the 	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	emission control program and will be and regularly tuned to prevent excessive TPM pollution.				
2.5 Disposal of Spoil and Solid Waste					
i. asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
ii. Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	<p>i The contractor will identify dumping locations for construction debris and non-hazardous solid waste with respective TMAs of Jacobabd and Ratodero.</p> <p>ii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.</p>	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise & Vibration					
i. Noise and Vibrations associated with earthworks and haul	i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust	During Construction	Construction areas	Contractor EHS	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
roads.	<ul style="list-style-type: none"> settling at least on road for 500m on either side of a village. ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800. iii Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities. 	period		Inspector	
ii. Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor EHS Inspector	Supervising Consultant
2.7 Quarry/Borrow Materials					
i. Overloading of trucks, may damage pavement, bridges, and culverts	i. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Throughout construction period	Construction sites	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor EHS Inspector	Supervising Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			
2.8 Contamination of Water Resources (Surface& Ground)					
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>				
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Before the start of construction work.</p> <p>Design phase.</p>	Where utilities services located	Contractor EHS Inspector	Supervising Consultant
2.10 Traffic Disturbance					
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.11 Health and Safety Concerns					
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with masks of a micron size, capable of capturing dust down to 2 microns.</p> <p>iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment.</p> <p>v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD &STI).</p>	Construction period	Construction Camps, Construction sites and Asphalt Plant area	Contractor EHS Officer	IA
2.12 Interruption /Contamination of Water channels					
	<p>i. Contractor should provide the adequate sized diversion, so that there shall be no</p>	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>disturbance to water flows of canal /water course.</p> <p>ii. Protection mechanism should be provided to avoid contamination.</p> <p>iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>				
2.13 Over Used Local Resources					
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
2.14 Contractor Good Housekeeping Practices not Applied					
	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection</p>	Throughout the construction period	All construction camps , work areas and	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>iii. program must be established Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>		contractor 'yards'		
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD & Contractor	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	-
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed	Operation period	As per design	Contractor and Traffic	ES/PMU /IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	limits shall be monitored by the traffic police to avoid any accident and subsequent spillage. An emergency service may be provided by the local authorities.			police	

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP	Before the tendering and before contract finalized	Date and time that confirmation completed filed with PMU	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Monitor to obtain copy of plan and record compliance—for presentation in smi-annual audit report	Prior to start of construction	Date and time that confirmation completed recorded & filed with PMU	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and compensation of losses Land owners will be compensated This will be monitored through ES- PMU</p>	<p>Monitor checks that topsoil management steps prepared and ready for implementation</p>	<p>During Planning phase, in parallel with the preparation of bid documents</p>	<p>Copy of topsoil protection actions</p>	<p>PMU</p>	<p>Supervision Consultant</p>
1.5. Disturbance to and Archaeological Cultural Sites	<p>Mosque officials shall be consulted before removing of courtyard; Protection through guard rail will be provided to mosque. The budgetary cost of reconstruction of is mentioned in the LARP report table ES-3</p>	<p>Ensure consulatation has been recorded confirmed by PMU planners</p> <p>Cost of reconstruction of courtyard shall be incorporated in BOQ item</p>	<p>Planning phase</p>	<p>Written and dated note indicating compliance</p>	<p>PMU</p>	<p>Supervision Consultant</p>

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report	Prior to contractor mobilization	Written and dated note indicating compliance & inspection	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	The work along this road will affect the access from a business and residence to the road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access	Review of plan and confirm a) consultation action proposed b) inclusion of timetable and c) inclusion of clean up and reconnection action.	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	Written and dated note indicating compliance	PMU	Supervision Consultant
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction	i. The Contractor will be required spray water on unsealed roads and work areas daily, within	Travel work areas and check for dust—and if found	Anywhere where there is material moved,	Written and dated note indicating	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> ii. Villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	take immediate action with contractor	earthworks cutting and filling.	compliance or issue and action taken		
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate action with contractor. Inspect batching plant dust suppression mechanism, its maintenance log book.	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially 	<ul style="list-style-type: none"> i. Check quarry sites for depth. ii. Ensure contractor store topsoil properly, and restore quarry site as much as possible at end of work. 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken	WSD	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>with debris/scrap material from old construction and levelled with stockpiled topsoil later.</p> <p>v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor</p>	iii. Ensure Land owner get adequate compensation				
2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be kept to a minimum by:</p> <p>i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications;</p> <p>ii. use appropriate octane fuel and haul loads within specified limits.</p> <p>iii. Vehicle idling time limits to no more than 2 minutes and</p> <p>v. Equipment maintenance specifications will be imposed through construction inspection and regular reporting.</p> <p>v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution.</p>	Record findings and conduct regular inspections in association with construction supervision	Throughout the construction period	Inspection note to file for use in contractor reporting and in semi-annual audit report	PMU	Supervision Consultant
2.5 Disposal of Spoil and Solid Waste						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps.	<p>i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective TMA's of Ratodero , Jacobabad and EPA Sindh. (regional office of District Sukkur)</p> <p>ii. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractors under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
2.6 Noise & Vibration						
i. Noise and Vibrations associated with earthworks and haul roads.	<p>i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village, Same approach is to be taken if the other site is used.</p> <p>ii. Restricting operating hours through</p>	Using a portable noise meter, monitor checks conditions , and inspects if work conducted within permitted time period on urban	Throughout construction period	Inspection note, signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	roadside villages and settlements to between hours of 0700 and 1800. iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.	zones				
ii. Excessive Noise at sensitive sites, identified in IEE, i.e. schools, residential areas, mosques, health care centers	ii. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Noise measurements at these sites recorded by monitor and if excessing, immediate action to erect temporary barriers	Throughout the construction period	Inspection note with noise reading results	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						
i. Overloading of trucks, damaging pavement, bridges, culverts etc	i. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials	Throughout construction period.	Inspection note re findings, dated and signed		
2.8 Contamination of Water Resources (Surface& Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be</p>	Regular inspection of work camps, contractors yard, fueling areas , fuel storage	At least monthly throughout the construction period.	<p>Checklist showing check fuel and lubricant handling, waste oil management , machinery was down water control, etc. signed and dated-- filed.</p> <p>Checklist showing the check for lighting and</p>	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing.</p> <p>iv. All diversions must be checked for Signages and lightings on weekly basis,</p>	Regular monitoring of diversion for signages and lightings	At least fortnightly where diversions are placed	signages signed and date filled		
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	Review of notifications and approvals from all utilities as per the legal requirements	Before the start of construction work. Design phase.	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.10 Traffic Disturbance						
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to	Inspect construction areas where access is an issue and establish if contractor is managing problem and if local residents are satisfied	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	be approved from The Engineer.					
2.11 Health and Safety Concerns						
i. Protecting the workforce and maintaining a safe working environment. ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.	i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides. ii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment. iii. All Construction labour and staff of the contractor and consultant will briefed in STD's and given option to be tested (personal choice).	Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.12 Inruption /Contamination of Water Sources						
	i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanisim should be provided to avoid contamination. iii. Contractor should prepare	216. In spection of diversion along the road, check	218. C ulverts and bridges	219. ontr acto r EHS Offic er	220. A /PM U	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>	<p>signages , lighting any leakage etc at the diversion and rectify through contractor.</p> <p>217. Ensure contractor has adequately restored temporary land.</p>				
2.13 Over Used Local Resources						
<p>i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.</p>	<p>i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.</p>	<p>Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern</p>	<p>Throughout construction period—at least once when work is near or in a community</p>	<p>Meeting note signed and dated</p>	<p>PMU</p>	<p>Supervision Consultant</p>

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
2.14 Contractor Good Housekeeping Practices not Applied	<ul style="list-style-type: none"> i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established iii. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation. 	Inspect all camp operations including worker housing and all waste management procedures	Throughout the construction period while work camps are in operation	Inspection note re findings, dated and signed	PMU	Supervision Consultant
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released	Obtain completion report and review for compliance	1 month before the end of the construction period	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	WSD	WSD

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

Initial Environmental Examination

P46377-PAK
TA 8406-PAK
July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Khyber to Sangar Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

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Initial Environmental Examination

March 2015

TA 8406-PAK: Provincial Road Improvement Program:
Rehabilitation of the Khyber to Sanghar Road No. 6

Prepared by the Engineering Consultant International Pvt. Ltd (ECIL) for the Sindh Works and Services Department and Asian Development Bank.

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
CO	mg/m ³	Carbon monoxide
dBA	dB	Decibels (A measure of audible noise)
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
GRM		Grievance Redress Mechanism
GFP		Grievance Focal Person
IEE		Initial Environmental Examination
IRI		International roughness index
km		kilometres
Km/h		Kilometres per hour
m		metres
mm		millimetres (1/1000 metre)
masl		metres above sea level
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PEPA		Pakistan Environmental Protection Agency
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
SNEQS		Sindh National Environmental Quality Standards
SO ₂		Sulphur dioxide
SPS 2009		ADB's 2009 Safeguard Policy Statement
SSEMP		Site Specific EMP
TPM	microgram s/m ³	Suspended particulate matter, with particles ≥ 10 microns in size, and a danger to lungs. Also referred to as PM ₁₀
S-EPA		Sindh Environment Protection Agency

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 6, the 64 km Mirwah to Naukot Road which links the N120 National Highway at Mirpurkhas district with the Naukot District Tharparkar. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WSD and any contractors on the EMP and the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

Any mosques, graveyards and other cultural sites that could potentially be affected by the work were identified. In the event, only one mosque, located at chainage 4+200-4+300, will be marginally affected. There should be no damage to other cultural sites or to any archaeological sites. Only three trees need to be cut, while trees on the embankments need not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are minor and able to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized

and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP is Rs 29,027,878.0 for the contractor including a 10% contingency.

I. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this aim, GoS proposes to reconstruct or rehabilitate 391 kilometres (km) of deteriorated roads with the help of a loan from the Asian Development Bank (ADB).
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing a new asphaltic concrete base and riding surface. Other sections will be rehabilitated; involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated (Table 1) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as :

Table 1: List of Selected Roads

Road sections	Km
Kandhkot–Jakobabad (01)	77
Jakobabad–Ratodero (02)	55
Khyber–Sanghar (03)	64
Sanghar–Mirpur Khas (04)	64
TM Khan–Badin (05)	67
Mirwah–Naukot (06)	64
Total	391

4. A separate IEE has been prepared for each road. This IEE is for Khyber to Sanghar.

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner

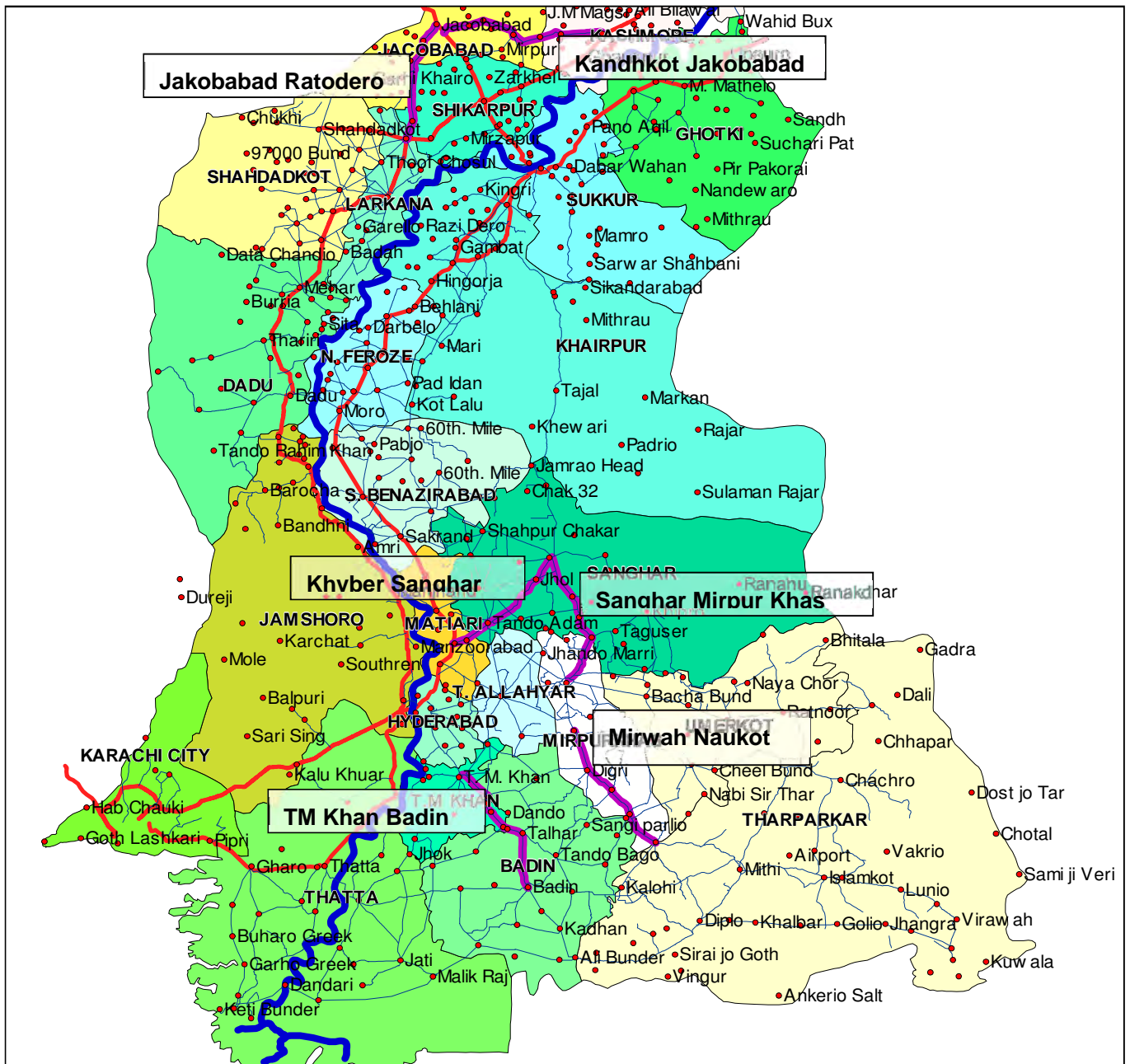


Figure 1: Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational.. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (S-EPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who must ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there will be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road's physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project's corridor of impact—generally considered to extend 15m each side of the carriageway centreline—was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.
13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Legislative and regulatory requirements pertaining to the project were reviewed along with other available data and previous IEE/EIA studies conducted in the region. Studies reviewed included the following:
- Hyderabad Mirpurkhas Dual Carriage way Road Environmental Impact Assessment Study (Final Report); Prepared by Project Procurement International; October 2009.
 - ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-PAK, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
 - National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
 - Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
 - Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.
15. In addition, the following web sites were reviewed and relevant information is included in this report.
- <http://www.meowweather.com> date visited: September 2014
 - www.pbs.gov.pk date visited: September 2014
 - <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each

action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure, and action to either prevent or minimize negative effects, was identified and a monitoring requirement specified. These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.
18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter IV and Annex I). An environmental classification of maintenance activities is included as Annex II.

II. PROJECT DESCRIPTION

A. Project Description

19. The project (No. 03) involves reconstructing the provincial road that links the N5 National Highway at Khyber in Matiari district with the district centre of Sanghar. The road passes through or around three provincial towns, Odero Lai, Tando Adam and Jhol (Figure 2). When reconstruction is complete, the road will form a new provincial highway linking Sanghar to the N5 for traffic to or from Hyderabad and Karachi.

B. Existing Condition of Project Road

20. The condition of the road varies with the worst section being the bypass around Tando Adam where the international roughness index (IRI) exceeds 16. A road in excellent condition would have an IRI of 2.0 or less and for provincial roads a maximum of 6.0 is normally the target, with anything over about 8.0 considered unacceptable. The average IRI between Khyber and Tando Adam is between 6 and 10 while between Tando Adam and Sanghar it is mostly between 5 and 8. Road widths generally vary from 6 m to 7.3m but some sections are narrower. The shoulders vary from 2.3 to 3 m.

21. A typical cross section also showing the existing road is shown as **Error! Reference source not found..**

C. Re-Construction and Rehabilitation to be Undertaken

1. Scope of Work

22. The project design has allowed for the entire length of the Khyber to Sanghar road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides for either or both actions to be taken. A full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations are included in the EMP

23. The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centre line. Both rehabilitation and reconstruction within the existing carriageway are category B works.

2. Reconstruction of existing carriageway

24. Reconstruction work involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where

necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.

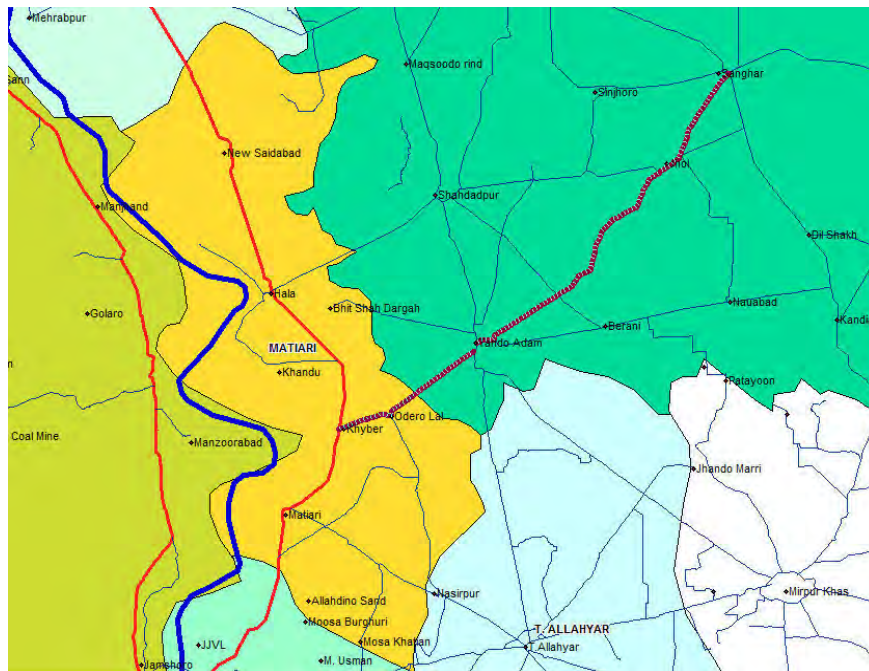


Figure 2 The Khyber to Sanghar Road

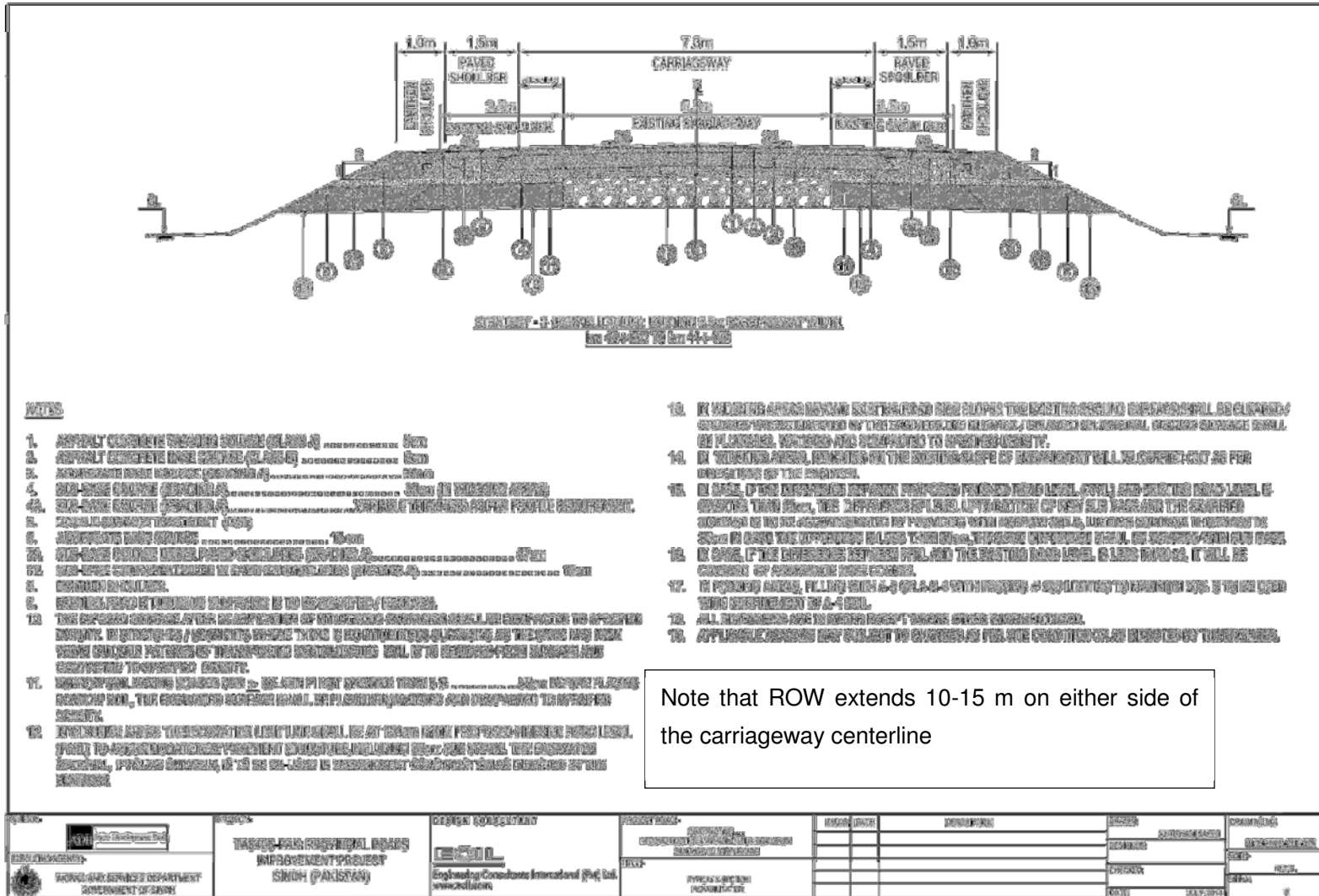


Figure 3 typical Cross section showing Existing Road

25. The main steps involved in reconstructing a section of road are:

- (i) Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- (ii) Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- (iii) Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- (iv) Use recycled or new crushed aggregate to provide a compacted aggregate base course over the width of the pavement (depth may vary as per profile)
- (v) Lay an asphaltic concrete base course (depth may vary as per profile)
- (vi) Lay a 50 mm asphaltic concrete wearing course
- (vii) Place 150 mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- (viii) Apply road markings and install signage and safety barriers as applicable
- (ix) Undertake any planting as appropriate

3. Rehabilitation (Overlay)

26. Rehabilitation involves scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses. The key steps are:

- (i) Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- (ii) Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- (iii) Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- (iv) Scarify existing bituminous surfacing. Material removed is to be transported to an approved disposal site.
- (v) Lay an asphaltic concrete base course (depth may vary as per profile)
- (vi) Lay a 50 mm asphaltic concrete wearing course
- (vii) Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- (viii) Apply road markings and install signage and safety barriers as applicable
- (ix) Undertake any planting as appropriate

4. Rectification of Bridges

27. There will be only one bridge with a ????? m span, located at chainage (51+091) requiring reconstruction as follows:

- (i) Preparation of a complete bridge inventory
- (ii) Cleaning of all concrete surfaces including girders and transoms.
- (iii) Providing plaster to guardrails and posts including curbs wherever necessary.
- (iv) Cleaning expansion joints.
- (v) Repairing training works wherever necessary
- (vi) New Deck construction (as and where required depending upon the deteriorated condition of Deck slab).

5. Reconstruction and Rehabilitation of Culverts

- (i) All vegetation , including trees and shrubs shall be removed from culvert inlet and outlet up to 15 ft, from either side.
- (ii) Where water channels have to be diverted or construction, this will be done during the dry season and new culverts will be placed on a 30 cm thick sand cushion.
- (iii) Lean concrete is to be placed, where culverts needs extension
- (iv) New RCC slab culvert to be provided as per the drawings, Re decking of culverts as and where applicable
- (v) Inventory of the repair work shall be prepared which shall consist of deep pointing of masonry including replacement of parts of masonry which has deteriorated and relaid with good quality bricks and mortar.
- (vi) In the base slab all pitting shall be rectified by providing bonding agent and a 3" thick concrete cover with 3/8" diameter bars placed at 9" centers. Anchor bars shall be drilled into the base slab. The anchor bars shall be 1/2" diameter placed 24" centere and drilled 6" into the base slab.
- (vii) The top slab shall be examined for any cracks which shall be repaired with epoxy injection.
- (viii) In places where the cover to concrete is no more and steel reinforced is exposed and rusted the area shall be marked and all rusted reinforcement shall be removed and replaced by better quality new reinforcement of the same size and area and nailed to the concrete surface. In such areas, concrete shall be chipped to at least 3" in thickness a bonding agent shall be applied and concrete shall be applied in the form of plaster with each layer not exceeding 1-1/2" in thickness. In order to ensure bonding of the new concrete with old concrete, steel rods half inch in diameter shall be drilled into the old concrete at 18" centers and grouted.

- (ix) After rectification work is carried out all the areas shall be coated with Brushcrete Compound of FOSROC manufacture.

D. Construction Materials

- 28. Construction materials require transportation from the source to the work site as follows.
- 29. **Stone-** Stone for base course is available at Kotri quarry, which lies at a distance of 60 Km from the NH5 end of the road at Khyber towards Karachi. It can be supplemented from Ganja quarry, which is at a distance of 35 km from Khyber.
- 30. **Bitumen-** The National Refinery Karachi (180 km from Khyber) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source.
- 31. **Cement** - There are quite a few cement factories in the vicinity of project road, namely Zeal Pak Cement Factory in Hyderabad (25 km from Khyber), Lucky Cement Limited and Power Cement Factory in Nooriabad (85 km from Khyber).
- 32. **Sand-**Good quality of sand is available at Bollori which is 15 Km beyond Kotri quarry as well as from Jamshoro which is in the vicinity of Hyderabad (25 km from Khyber) There are other quarry sites available in the sub-project area which can be utilized. These are all within 80 km of where road maintenance and rehabilitation will take place.
- 33. **Steel Reinforcement (Rebar)-** The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:
 - (i) Mehran Mills
 - (ii) Islam Mills
 - (iii) Hyderabad Mills
- 34. The distance from Hyderabad mills to Khyber, the project start location, is about 25 kilometers.
- 35. **Aggregate and Concrete** - Crushed stone aggregate for concrete is available in Nooriabad, Jamshoro, Petaro, all between 40 and 60 kilometers from the road.
 - (iv) Crushed Aggregate for Asphalt Concrete Petaro Quarry
 - (v) Sub Base (Muram) Kotri Quarry
 - (vi) Aggregate Base Course Petaro Quarry
 - (vii) River Sand From Indus River Basin
- 36. **Bricks-** The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.

37. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation and Drainage Authority. While the amount of water required is considerable, it is should be negligible when compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 12 to 14 meters.

38. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.

Option 1: Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.

Option 2: Waste material can be used to refill borrow pits and covered with topsoil¹

Option 3: Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.

39. The total quantity of material to be disposed of is estimated to be 21,000.00 m³.

III. DESCRIPTION OF ENVIRONMENT

40. The description of the environment of the project roads requires baseline data on the following:

- (i) Physical Environment
- (ii) Ecological Resources
- (iii) Socioeconomic Environment

A. Physical Environment

1. Topography

41. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South. The Khyber–Sanghar road lies in the central alluvial plain.

¹ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

2. Soils

42. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in the Nara and Jamrao Canal command area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread, but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.
43. The alluvial deposits date back to the time when the Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

44. The seasons in Pakistan can be best classified as
- (i) Winter, from December to March;
 - (ii) Pre-monsoon (summer), April and May;
 - (iii) Monsoon, from June to September;
 - (iv) Post-monsoon, from October to November; and
 - (v) Summer season runs from April until October and winter runs from November to March.
45. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, but largely escapes the influence of both, resulting in a rainfall of only 15 to 18 cm per year.

For the Khyber to Sanghar road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in

46. Table 2.

Table 2: Average Air Temperature and Precipitation in Sanghar³

Sanghar			
	Temperature °C		Precipitation (mm)
	Maximum	Minimum	
January	24	6.8	2

² Site visited on dated 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on dated 18.01.2015.

³ <http://www.meoweather.com> site visited September 2014.

Sanghar			
	Temperature °C		Precipitation (mm)
	Maximum	Minimum	
February	27.9	9.9	0.7
March	33.7	15.3	2.4
April	39.8	20	5.4
May	44.1	25.2	0.4
June	43.3	28	4.2
July	40.3	27.7	37.4
August	38.8	26.4	21.3
September	38.6	24.6	1.5
October	37.4	19.3	1.3
November	32	13.2	2.5
December	25.6	8.6	4.8

4. Air Quality and Noise

47. The Khyber Sanghar road is located in a rural area and human activity is primarily related to agriculture with the major air quality issue being particulate matter (PM₁₀) due to heavy dust which occurs due to the very dry and windy conditions. The situation is aggravated by human activity such as cultivation of the fields. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.

48. Since WSD has not yet established its own environmental monitoring capacity, there is no comprehensive air quality and traffic noise monitoring data available. However, data are available for the Hyderabad- Mirpurkhas road, between 25 and 50 kilometres to the south of the project road (Table 3).

Table 3 Ambient Air Quality – Hyderabad–Mirpurkhas road⁴

S.NO	Test Method	Parameter	Units	Sample Location		GoP Standards (NEQS)
				Tando Allahyar	Tando Jam	
1	By Analyzer	Particulate Matter (PM ₁₀)	mg/m ³	0.967	0.539	0.150

⁴ EIA Mirpurkhas-Hyderabad dual Carriageway Units converted from ug/m³ and ppm to mg/Nm³

2.	ISO-4221	Oxides of sulfur (SOx)	mg/m ³	0.023	0.036	0.120
3.	ISO-6768	Oxides of nitrogen(NOx)	mg/m ³	0.031	0.045	0.040
4	By analyzer	Carbon dioxide (CO2)	mg/m ³	546	701	----

49. Traffic volume is low and the adjacent land use is primarily agricultural. Both road and ambient noise levels increase when the project road enters into a town. Data for Tando Jam and Tando Allahyar on the Hyderabad – Mirpurkhas, two small to medium sized towns along a nearby provincial highway and are considered typical of the expected conditions (**Table 44**). These noise levels are exceeding commercial areas NEQS /GoP Standards in day time limits.

Table 4: Noise Intensity in Medium-Sized Towns⁵

Location	Noise intensity dBA	NEQS/GoP Standard	
		Day	Night
Tando Allahyar	72	65	55
Tando Jam	82	65	55

5. Hydrology

50. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps in use. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies from 3 meters to 25 meters along the route. Sanghar district is irrigated by the canals from the Guddu and Sukkur barrage system or by tube wells in areas not served by the canal network. There are three major canals, seven minor canals and thirty six water courses crossed by the Khyber to Sanghar road. These water sources run the entire year and are the major source of drinking water as well as water for irrigation.

51. Excessive irrigation and seepage from canals has caused water logging and salinization problems near Sanghar. Recent floods have exacerbated this problem, since farmers

⁵ EIA Mirpurkhas-Hyderabad dual Carriageway.

have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface.

6. Seismicity

52. According to the seismic zone map of Pakistan, the Project Area lies in the zone where minor to moderate damage can occur as shown in Figure 4

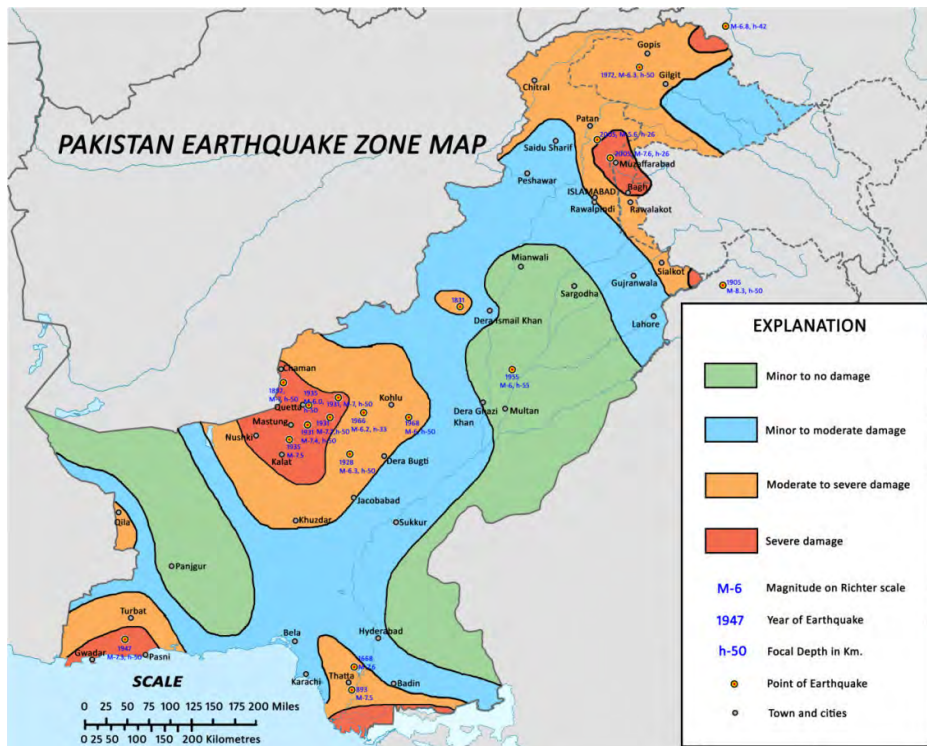


Figure 4 Pakistan Earthquake Zones

7. Archaeological and Cultural Resources

53. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.

Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Twenty five mosques, two graveyards and four shrines were identified as being potentially affected by the proposed work on the Khyber to Sanghar road. A detailed inventory of the sites showing the approximate location of the structures is provided in

54. Table 5. By applying careful highway design all potential impacts were avoided. However care will need to be taken during construction activity.

Table 5: List of Archaeological and Cultural Resources Impinging on the ROW

0-10 km			11-20 km			21-30 km			31-40 km			41-50 km			51-60 km			61-70 km		
M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G
8	0	0	5	1	0	2	0	0	4	2	0	2	2	2	4	0	0	0	0	0
Mosque =25 , Shrines 4 and Graveyards 2																				

Note: M = mosque, S = shrine, G = graveyard.

B. Ecological Resources

55. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

56. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.

57. The dominant trees in lower Sindh are babul (*Populus euphratica*), ber (*Zizyphus numularia*) and several varieties of *Tamarix* such as *plai* (*Tamarix gallica*) and *jhao* (*Tamarix diocia*), *talhi* (*Dalbergia sisoo*), *kri* (*Tamarix gallica*), *karir* (*Copparis aphylla*).

58. Of more concern would be damage to old plantations of *Azadirachta indica* (Neem), *Albizia lebbek* (Shrin), *Ficus religiosa* (Peepal), *Acacia nilotica* (Babul), *Cordia myxa* (Lasura) and *Ficus benghalensis* (Borh), and recent plantation of *Cornucopias*. These trees have significant medicinal value or are important culturally.

59. Among the grasses; *Lumb* (*Arislida depressa*), *Chemmer* (*Eleusine compressa*), *Gorkha* (*lasiurus sindicus*) and *Kana* (*Saccharum bengalensis*) are found in the Project Area. *Koondeor Dib* (*Typha augustata*) is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

60. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.

61. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

62. Reptiles include snakes such as cobra (*Naja naja*), rattlesnakes (*Crotalus horridus*) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (*Varanus* sp.), spiny tailed lizard (*Uromatix hardwickii*) and fringed toed lizard (*Acanthodactylus contoris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

63. Important bird species found in the project area are the common crow (*Corvus brachyrhynchos*), common mynah (*Acridotheres tristis*), house sparrow (*Passer domesticus*) and common teal (*Anas crecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdix perdix* and *Melanoperdix niger*), though present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coracias benghalensis*), crested lark (*Galerida cristata*), vultures (several varieties) and quail. White heron (*Ardea alba*) and black heron (*Egretta ardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconia ciconia*), white pelican (*Pelecanus onocrotalus*), little brown dove (*Spilopelia senegalensis*) and white throated king fisher (*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

64. There are no wildlife sanctuaries or national parks or game reserves located in the project area.
65. The Sindh Wildlife Department recognizes 13 game reserves in Sindh province, the closest is Hala, some 15 km north of the road.
66. The Nara desert provides refuge to a large number of wildlife in Sind province. The Nara Canal Area, a chain of some 200 small, permanent and seasonal, freshwater, brackish and saline lakes and marshes stretching for about 150 km along either side of the Nara Canal from Sorah in the north to Sanghar in the south is known to be of great importance for wintering waterfowl and other wildlife. The Nara desert area is 30 kilometres to the north of the road and reconstruction of the project road will have no impact.
67. The nearest wetlands area is the Chotiari water reservoir, some 35 kilometres north-east of the road corridor.

F. Socio-Economic Environment

1. Road Transport

68. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. These data show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in Table 6.

Table 6 Twenty four hour Traffic count (number of vehicles) along subproject road

Section	Motorcycle	Car/ 4wd	Rick shaw	Vans/ PickUp Trucks	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
Khyber - Tando Adam	2952	886	1601	637	50	124	222	148	20	4	11	6653
Tando Adam - Sanghar	2617	824	1575	412	16	37	148	99	19	7	29	5784

69. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons. The Consultant met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to include approximately 400 heavy vehicles a day (mainly 2 axle trucks and tractor-trailers); twice the number surveyed in June.

2. Structures Affected

During the topographic survey a small number of structures were found in the Khyber Sanghar road RoW. None of these have encroached on the pavement, but some structures are within the paved or unpaved shoulders (including those shown in

70. Table 5). These encroachments are illegal but if people are moved or cultivated land is taken, compensation under SPS 2009 and ADB's Involuntary Resettlement Guidelines is nevertheless required. Resettlement is the subject of a separate land acquisition and resettlement plan (LARP).

71. By judicious road design, it was possible to avoid these encroachments, with the result that there will be no residential, commercial, religious or cultural structures or sites affected. Some bus stops and police check post will be removed and reconstructed.

3. Drinking Water

72. During the survey it was learnt that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location, with areas close to irrigational canals having comparatively better quality water while water in some other areas is saline.

4. Industrial and Commercial Activities

73. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, Cotton ginning and flour mills. There are also some brick kilns.

5. Employment and Income Sources in Project Area

74. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

75. Agricultural lands are owned by landlords and farmers work for a share of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves. They graze cattle and grow vegetables for food.

76. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.

77. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic

opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.

78. According to baseline surveys, agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers and kiosk holders, small business and as labourers in the sugar, cotton and rice industry and 5% are in government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.

6. Demography

79. The project road is located in the Sanghar district, and the demography is diverse (Table 7).

Table 7 Demography of the Subproject road Khyber to Sanghar⁶

Factor	Sanghar
Area: km ²	10608
Population (Persons)	1421977
Male	746127(47.52)
Female	675850(47.52)
Sex ratio (M:F)	110.4:100
Population Density	134 per km ²
Urban Population	331,316 (23.29%)
Rural Population	1,090,6610 (76.7%)
Avg Household size	5.8 people
Literacy ratio 10+	31.0%
Male	42.88%
Female	17.45%

80. Tribal people include Arain, Butt, Bheel, Chandio, Jamali, Khoso, Kolhi, Junejo ,Leghari, Memon, Malik, Lashari, Rind, Burdi, Syed, and Solangi. Sindhi language is commonly spoken as mother tongue of majority of the communities in the project area. However, Balochi, Urdu, Punjabi and Siraiki languages are also spoken and understood.

7. Archaeological, Cultural and Historical Resources

81. There are no archaeological, cultural or historical resources in this corridor and none will be impacted by any of the work activities.

⁶ www.pbs.gov.pk
<http://dearsir.pk>

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design and Pre-Construction Phase Impacts

1. Loss of Vegetation and Trees

a) Description

82. There are various trees located on the both sides of the Khyber Sanghar road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to meet road safety standards. There will be loss of vegetation in some locations, but always within the road ROW. Any tree cutting would be undertaken before construction commences.

b) Mitigation Measures

83. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every mature tree cut down.

2. Disturbance to Archaeological and Cultural Sites

84. Normally archaeological and cultural sites are identified in advance of construction so that measures to preserve or protect the sites can be taken in advance. There are no cultural or archaeological sites found in the Khyber to Sanghar road and thus no mitigation measures are required.

3. Lack of Environmental Capacity

a) Description

85. During the field surveys it became very clear that the provincial and district government officials who will be charged with overseeing the construction have a very poor understanding of environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented will be very small.

b) Mitigation Measure

86. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

87. A small increase in particulate matter (dust) is expected within construction airshed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

88. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii) spraying of water on unsealed roads and work areas within villages and past houses located close to the road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

89. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plant, require cement and dry sand a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust in emitted when bagged cement is loaded manually into the batch plant hopper, as well as with the conveyor system bringing the materials to the plant.

b) Mitigation Measure

90. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted

3. Topsoil Erosion

a) Description

91. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

92. Excavation of earth fill will be limited to an appropriate depth of 20cm. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. Where deep ditching is carried out, the

top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

93. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

94. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with twelve months of the start of the work. Secondly no construction vehicles will be left idling for more than two minutes.

5. Disposal of Spoil and Solid Waste

a) Description

95. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.

a) Mitigation Measures

96. The asphalt and base course removed from the existing road will be recycled⁷. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverised, spread on access roads and compacted.

97. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective Taluka Municipal Association (TMA) Sanghar, Mirpurkhas, and EPA Mirpurkhas.

98. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

⁷ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

6. Noise and Vibration

a) Description

99. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.
100. Vibration will occur during compaction when vibratory rollers are used to compact subgrade materials. This is unlikely to cause permanent damage.

b) Mitigation Measures

101. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured against the Sindh Provincial and Pakistan National Environmental Quality Standards . Exceedances of these standards will require immediate noise reduction measures such as baffles and barriers.

7. Quarry /Borrow Material

a) Description

102. Transport of construction material (aggregate and fill) may raise environmental and social issues with the possibility of damage to bridges and pavements if vehicles are overloaded.
103. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

104. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.
105. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Borrow material must be taken only with the consent of the land owner and if the contractor is found to be in violation, will be fined in addition to having to completely rehabilitate and re-vegetate the site(s).

106. The contractor will ensure that the use of productive and agriculture land and the loss of vegetation is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

107. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.
108. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.
109. Canals and water courses crossed the Khyber Sanghar road, during rehabilitation works of culverts and bridges can be polluted by accidental discharge of cement and other chemicals like epoxy and paints.

b) Mitigation Measures

110. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA approved site. New soil should be brought in as required so that the ground surface is re-established.
111. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.
112. The water channels have to be diverted properly, a protection mechanism should be provided; or construction will be undertaken during the dry season.

9. Damage / disturbance to Utilities Services

a) Description

113. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

114. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance

a) Description

115. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

116. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

117. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitos and rodents.
118. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.
119. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.
120. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

121. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or let enter streams where it can affect downstream water quality, aquatic environments and human health.
122. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.
123. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area where cement dust is in the air.
124. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to insure compliance with the requirement of dust masks.

12. Burden on Local Resources

a) Description

125. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife. The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

126. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

13. Inadequate Camp Site Good Housekeeping

a) Description

127. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

128. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.

- Train work force in storage and handling of materials
- Fire fighting
- Camp sewage will be treated in pit latrines or septic tanks which will be drained and sewage taken to a sewage treatment plant for processing. The treatment/management will be done according to the provision defined in the Pakistan EPA-specifications, which the contractor will have to become familiar with. Disposal will be recorded in a table and submitted as part of the semi-annual reporting to ADB.

129. Contractor will prepare as part of site specific EMP the following special sub-plans:.

- Traffic management plan-addressing construction related delays and a protocol for day-to-day management. Traffic management is also addressed in the contract specifications for the engineering works.
- Waste management plan specifying the treatment and disposal of garbage, sewage and oily waste at the contractor's camps and yards.
- Borrow site management plan –addressing preparation of access roads and decommissioning following use, of any borrow sites opened by the contractor. Operating licensed facilities will not be included in this management plan, as they are already monitoring by the authorities.

130. The SSEMP, together with the sub-plans will be approved by the executing agency as well as the ADB, prior to the contractor mobilizing to the field

14. Diversion of Water channels (Water Supply and Traffic)

a) Description

131. Inadequate diversion of canal / water course will affect the water supply to agriculture land of communities living nearby, which may create the social issue.

132. Insufficient diversions/bypasses around bridges and culverts under construction could cause the distrucbance to construction activity as well as creating the nuisance for community and project workers.

b) Mitigation Measure

133. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course.

134. Adequate Traffic Management plan and diversion shall be provided by the Contractor. signages and lighting may also be provided during the night time to avoid any accidents

C. Operation Phase Impacts

135. Most of the impacts at the operation stage are positive and do not require mitigation. These include:

- Improved access to markets
- Reduced travel times
- Lower vehicle operating costs
- Reduced dust

136. However there are some negative impacts and these are listed in the following sections.

1. Increased Traffic Volumes

a) Description

137. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

138. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

2. Increased Risk of Accidents

a) Description

139. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.

140. The requirements of SPS 2009 have resulted in a road design that has had to balance road safety against the need to displace encroachers or acquire land.

b) Mitigation Measures

141. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds

142. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.
143. Traffic police should be trained to more consistently enforce road rules.
144. One of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties should be sought.

V. GRIEVANCE REDRESS MECHANISM

A. Organisation

145. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Khyber to Sanghar road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.
146. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, a Jirga member or notable person as Focal person, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.
147. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with affected village committees prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessible to potentially affected persons.
148. Contact details will be distributed by the GRO to each village head in the appropriate local language, for posting in the village office.
149. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

150. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.
151. The first step (Figure 5) on receiving a grievance will be for the GFP to take this up with the GRO , who will discuss this with the contractor, and given one week to respond to the grievance.
152. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.
153. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.
154. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.
- 155.
156. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:
- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
 - (ii) Updating the complaints database routinely;
 - (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
 - (iv) Collecting and submitting input for inclusion in progress reports for ADB.

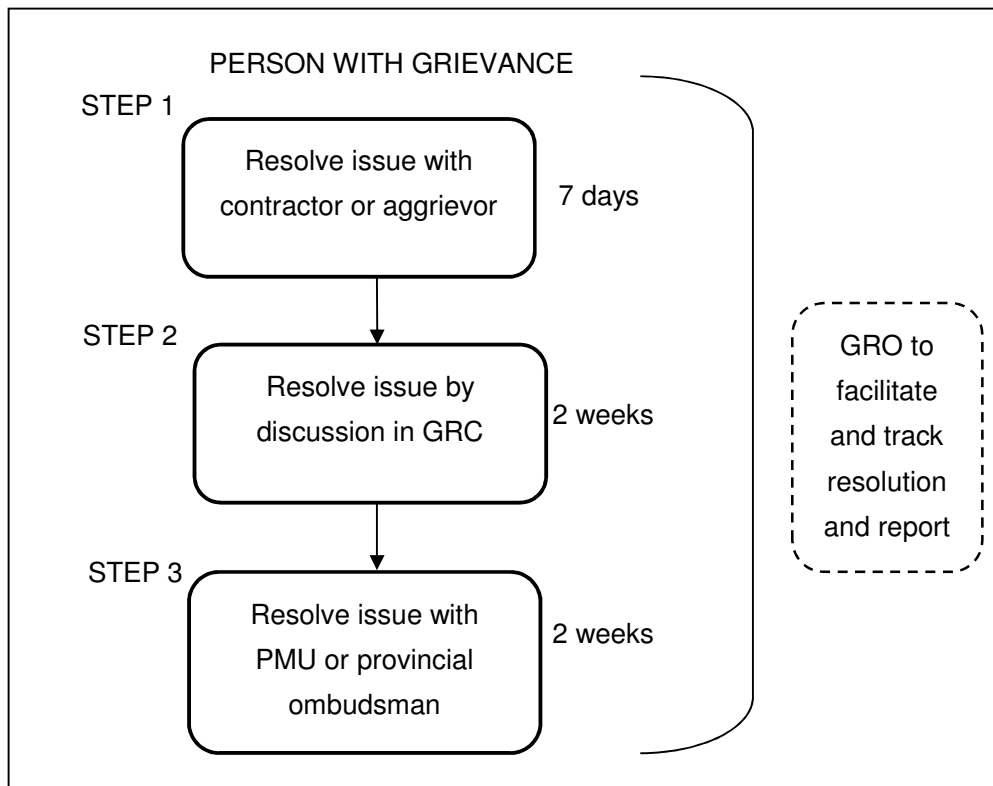


Figure 5. Steps of the Grievance Redress Process

VI. PUBLIC CONSULTATION

A. Objectives of Public Consultation

157. The overall objectives of the consultation process were as follows:

- (vi) To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
- (vii) To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
- (viii) To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
- (ix) To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

158. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Forest Department, Livestock Department, Sindh Environment Protection Agency, and the Deputy Commissioner Sanghar. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.

159. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

160. Community consultations consisted of formal and informal meetings at Udero Lal Station, Tando Adam, Jhol and Sanghar City. The consultation exercise was conducted in both Sindhi and Urdu languages, on June 27 and 28th, 2014. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.

161. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.

162. The people interviewed (Table 9) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

163. A matrix of concerns raised by community members was prepared (Table 8). The register of attendance is provided as Table 9. A pictorial record of the meetings is included as Annex 10.

Table 8: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns Raised by Community	Remarks
Road design	Storm drainage should be provided at Udero lal, and Jhol city Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction/Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss in the Jhol city during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction

Issues	Concerns Raised by Community	Remarks
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	Construction will be programmed to minimise the length of disruption at any one point These issues will be addressed once road constructed

164. As appropriate these concerns have been incorporated into the EMP items.

Table 9: General Public Interviewed During Public Consultation at Khyber–Sanghar Road

Name	Town/Village	Position /Occupation
Muhammad Umer	Udero Lal	Villager
Vakeel Ahmed	Udero Lal	Shopkeeper
Ghulam Muhammad	Udero Lal	Tea shop owner
Muhmmad Rahim	Udero Lal	Villager
Aneel	Udero Lal	Villager
Saleem	Udero Lal	Villager
Sikandar Ali	Jhol City	Student

Name	Town/Village	Position /Occupation
Kishore Kumar	Jhol City	Student
Manthar Brohi	Jhol City	Villager
Liaquat Ali Brohi	Jhol City	Shop owner
Moula Bux	Jhol City	Villager
Muhammad Hanif	Jhol City	Villager
Shahnawaz	Jhol City	Villager
Shahid	Jhol City	Shopkeeper
Ghulam Mustafa	Jhol City	Bus Driver
Zawar Ali Khaskheli	Tando Adam	Restaurant Owner
Moula Bux Raho	Tando Adam	Assistant Engineer WSD
Muhammad Ramzan	Tando Adam	Sub-Engineer WSD
Khalid Hussain Khaskheli	Tando Adam	Villager

3. Government Agencies

165. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices (Table 10). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below. Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in Table 10. Pictures of the meetings are provided in Annex-10.

a) Environment Protection Agency Sindh (Mirpurkhas Regional Office)

166. The Mirpurkhas office of the Sindh EPA is responsible for general environment protection in the project area. A meeting was held with the Deputy Director Mr. Shoib Rajput and his clerical staff. The main points are as follows:

- (i) In general, the participants approved of the project and were of the opinion that there is dire need of this kind of project as the recent floods had badly damaged this road.
- (ii) A tree inventory shall be made before start of work, and tree plantation shall be carried out as per ADB Policy and local laws. A budget shall be kept for this purpose and specified in the BOQ and contract documents.

- (iii) Jobs shall be provided for locals during construction and operation phase
- (iv) Contractor shall dispose the hazardous waste through EPA certified contractors.
- (v) Due to unavailability of Safe drinking water Hepatitis C is spreading in the region.
- (vi) There is no proper landfill site in the project area (Mirpurkhas and Sanghar) A dumping site for any non-hazardous waste will be indicated to the contractor jointly by the EPA Office and local TMA.
- (vii) Currently 75% of solid waste is left unattended. The leftover material is being openly burnt which is causing health issues.

b) District Forest Office Mirpurkhas and Sanghar

167. A consultation meeting was held with Mr. Shahzad Saddiq Gill District Forest Officer (DFO Mirpurkhas), Mr. Abdul Rasheed Range Officer Mirpurkhas, Mr Gul Junejo DFO Sanghar to discuss environmental issues related to the proposed project. The consultant team provided information about the proposed project with the help of the project area map and requested the officers to identify any protected forest or other concerns of the Department. A set questionnaire was also filled during the meeting. During the meeting the DFO expressed some reservation regarding the project. Their views and answers are re-produced as follows.

- (i) He appreciated the project activities; and thought this kind of project will increase the employment opportunities in the area and increate business opportunities.
- (ii) He also said that this project will reduce the travel time, and energy of locals as the current road condition is poor.
- (iii) He also said this kind of project will help to shift the demand of wood, when people of the area get the gas they will not burn wood as fuel.
- (iv) He said the reserved forest of the area should not be disturbed at all and he mentioned that Khipro Forest is the only protected forest of the area.
- (v) The Range Officer mentioned that the Forest Department has planted some 865 cornucopias trees of along the project road. They should be protected, or if cutting is unavoidable, re planting shall be carried out as per local law.

c) Municipal Administration and District Commissioner Sanghar

168. A meeting was held with Additional Deputy Commissioner II, Mr Dedar Hussain Baloch and Mr Lal Khan acting TMO. The meeting was held at the Additional Deputy Commissioner's office at Sanghar. After welcoming the project, he and the TMA Sanghar representative raised the following points.

- (i) Generally they supported the project and were of the opinion that there is dire need of these kinds of project shall be started as soon as possible.

- (ii) There is no proper landfill site in Sanghar City. Waste is being dumped in six local ditches which are nearly full. He also mentioned that currently TMA has insufficient equipment for the solid waste collection.
- (iii) Wastewater from the city is being dumped into seepage drains. There is no wastewater treatment plant in the city.
- (iv) Local people should get preferential treatment for the employment on the project;
- (v) A suitable alternate route should be made available during project execution;
- (vi) Sugar-cane traffic will need to be managed in the area of Sanghar Sugar mill.

4. Non-Government Organizations

169. After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development and were consulted for this project. Mr. Muhammad Hussain from the NGO HANDS made the following comments and suggestions;

- (vii) As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- (viii) Better road conditions will reduce the rate of accidents around the sugar mills
- (ix) Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.

C. List of Public and NGO Sector Stakeholders Consulted

170. A number of stakeholders, other than the general public, who are likely to be benefitted or be involved during the project execution phase, were also consulted (.Table 10).

Table 10: List of Stakeholders Consulted for Khyber–Sanghar Road

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Shoib Rajput	Provincial Government	Deputy Director EPA Sindh
Mr Shehzad Saddiq Gil	Provincial Government	Divisional Forest Officer Mirpurkhas
Mr. Gul Junejo	Provincial Government	Divisional Forest Officer Sanghar
Mr Abdul Rasheed	Provincial Government	Range Forest Officer Mirpurkhas

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Dedar Hussain Baloch	District Government	District Municipal Administration Sanghar
Mr. Lal Khan	District Government	Acting Taluka Municipal Officer
Mr. Muhammad Hussain	NGO	HANDS (NGO)

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

171. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- (i) Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- (ii) Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- (iii) Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- (iv) Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects monitoring mechanism, defined in the EMP's two action tables.

B. Environmental Management Plan for Khyber Sanghar

172. The EMP, mitigation and monitoring tables for the Khyber to Sanghar road is included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs (**Error! Reference source not found.**) will be used to prepare a specific environmental safeguards section in the construction Bill Of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

173. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

174. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential

negative impacts. The value of the environmental assessment process can be undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

175. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20 m–25 m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.
176. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.
177. A Site specific EMP (SSEMP) is to be prepared by the contractor, based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.
178. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.
179. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

180. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which need to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation

and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit (ESU) (a section within the PMU) will be mainly responsible for implementing the EMP.

181. There are eleven Construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

3. Operating Phase

182. The four actions defined in the operation period focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. All the work proposed is on existing roads and confined to the existing RoW. There will be some increase in the speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2). Speed limits will be monitored through traffic police as discussed earlier.

Table 11. EMP Mitigation and Monitoring Implementation Cost Estimate

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 188 persons)			458250	458250	916,500
Generators and Construction Machinery Noise Monitoring	7000	83	6972000	6972000	13,944,000
Drinking Water Quality Monitoring (During Const)	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	8000	188	1,504,000	-----	1,504,000
Personal Protective Equipments (for 200 persons approx) replacing every year)		200	1070000	1070000	2,140,000
Fire Fighting Equipments purchase and refilling		30	250,000	100,000	350,000

Health and Hygiene	--	--	622,240	622,240	1,244,480
Noise Meter	25000	2	50,000	----	50,000
Environmental Officer Salary	150,000	1	1800,000	1800,000	3,600,000
Environmental Inspector Salary	100,000	1	1200,000	1200,000	2,400,000
Contingency Cost 10%					2,638,898
Total					29,027,878.00

183. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:

- Less travelling time
- Quicker access to Market
- Fuel efficiency
- Less dust generation
- Safer journeys

C. Cost Estimates

184. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs and monitoring visits, training costs, etc. Table 11 shows the cost to be included in the BOQ items by the contractor.

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

185. The Sindh provincial road improvement project will be coordinated by the Works and Services Department as an executing agency (EA) with a project management unit (PMU) established within Works and services Department as Implementation Agency. The PMU will be self sufficient to monitor the Environment related issues.

186. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

187. The Project Management consultant (PMC) will support all Deputy Directors and PMU for project development. The PMC's environment experts will support the ESU in ensuring that project roads comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 (Table 12.)

Table 12 Implementation Organisation for Road Reconstruction and Rehabilitation

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International ECIL
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

188. The ESU will, with assistance from of the PMC environmental specialist:

- (v) Prepare environmental screening checklists;
- (vi) Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
- (vii) Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
- (viii) Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
- (ix) Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors;
- (x) Ensure that the required environmental training is provided to the staff concerned;

189. Contractor will hire two full time persons to address the environmental safeguards; Environmental Engineer's responsibilities will include;

- Prepare Site specific EMP as per generic EMP of this road.
- Monitor the work and undertaken the monthly reporting.
- Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
- Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
- Coordinate with PMU Environment specialist to conduct site visits.

- Impart trainings as per schedule.
- Prepare monthly environmental monitoring report

190. Environment inspector responsibilities will include;

- Conduct day to day Site inspection activities for any non-compliance
- Conduct environmental monitoring activities through certified environmental laboratory.

191. ADB's responsibility will be to review IEEs as a basis for the approval of the subproject.

3. Monitoring and Reporting

192. Following section describes monitoring and reporting frequencies and responsibilities;

a) Implementing Agency

- The IA's Environmental Safeguards Unit will prepare a compliance monitoring checklist, based on the EMP and brief Environment Engineer of the Contractor on its use and implementation schedule. The checklist will be completed monthly.
- Carry out field visits for HSE compliance monitoring on quarterly basis
- The Implementing agency will use the compliance checklist reports, plus a semi-annual audit of the work as the bulk of the content of the semi-annual construction monitoring report to ADB..

b) Project Management Consultants

- Ensure the compliance monitoring is being carried out monthly, quarterly and semi annually during the construction period.
- If non compliance is recorded, conduct review meetings with Contractor to address the non-compliance.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, defining what mitigative actions have been undertaken and where this work was done.
- Conduct the Environmental Monitoring (Air, Drinking water Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in the EMP.

VIII. CONCLUSION AN RECOMMENDATIONS

A. Principal Findings

193. This IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services department. This IEE is in respect of the Khyber to Sanghar road.
194. The proposed rehabilitation/reconstruction of the Khyber to Sanghar road will have very little environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites or on fauna or flora. The environmental category is 'B'. There is a minimal requirement for resettlement of illegal encroachers; this is being addressed in a separate LARP.
195. The following are the main issues identified and concerns raised during the study:
- (xi) The project road is in bad condition and travel time is around double of what one would be expected for a road in good condition;
 - (xii) The road embankment is eroded in some places;
 - (xiii) There are mosques, graveyards and shrines built adjacent to the ROW of the project road but no cultural or sensitive structure will be affected.;
 - (xiv) There are major and minor canals and waterways crossing the road, requiring special care during construction works
 - (xv) There is only one designated forest in District Sanghar, Khipro Forest. This is far from the project road and will be unaffected.

B. Conclusion

196. The improvement of the Khyber to Sanghar road, part of the Provincial Road Improvement Project of the Government of Sindh, is limited to road reconstruction within the existing right of way. It is therefore likely to have only limited impact of a temporary nature and short duration. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
197. Provided the EMP is followed, there should be no damage to cultural and archaeological sites. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by concerned agencies, including Contractor, Environment Specialist ES (PMC) and PMU-W&S Department. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.

198. This IEE study concludes that the proposed pilot road project will not lead to significant adverse environmental and social impacts of such nature or magnitude that would require a more detailed report in the form of an EIA. Additionally careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.
199. The project has been discussed with local people, government officials and NGO. The consultations elicited general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust. There was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

200. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.
201. The following recommendations are carried over from the text:
- (xvi) Environmental monitoring shall be carried out by the IA and contractor in compliance with the EMP to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
 - (xvii) The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
 - (xviii) Trees located on the embankments will not be disturbed.
 - (xix) Asphalt plant shall be located at least two kilometres from settlements
 - (xx) Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
 - (xxi) SSEMP will be developed by the contractor which needs to be reviewed by the PMC, approved by IA and final approval is required from ADB. Contractor will not able to start the construction till the SSEMP is not approved.
 - (xxii) Excavation of earth fill will be limited to an appropriate depth of 20cm.
 - (xxiii) Canals and other water resources will be closely monitored to ensure no contamination occurs due to project related activities

- (xxiv) A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
- (xxv) Health and safety plans will be prepared.
- (xxvi) Construction work shall not hinder local people's access to nearby facilities.
- (xxvii) An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
- (xxviii) A grievance redress mechanism will be implemented by the contractor to ensure that community complains are addressed and recorded.

Annex 1
**Table 13 Environmental Management Plan: Environmental Mitigation
Table (EmiT) and Environmental Monitoring Table (EmoT)**

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for Khyber -Sanghar Road.	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	No cultural or archaeological sites have been identified in the Khyber to Sanghar road and thus no mitigation measures are required.	----	---	----	----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	NA	WSD	Supervision Consultant
1.8. Contractor's Environmental	Unfortunately contractors have a very poor record with complying with	Plan to be provided the	WSD	WSD	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
Safeguards Capacity	workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Consulting Engineer and PMU prior to start of work			
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be minimised by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, iv. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.5 Disposal of Spoil and Solid Waste					
i. asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
ii. Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	i The contractor will identify dumping locations for construction debris and non-hazardous solid waste with respective TMA Sanghar, and EPA Mirpurkhas. ii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014. iii The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise and Vibration					
i. Noise and Vibrations associated with earthworks and haul roads.	i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village. ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800. iii Large and noisy machinery	During Construction period	Construction areas	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities.				
ii. Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor EHS Inspector	Supervising Consultant
2.7 Quarry/Borrow Materials					
i. Overloading of trucks, may damage pavement, bridges, and culverts	. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Throughout construction period	Construction sites	Contractor EHS Inspector	Supervising Consultant
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor EHS Inspector	Supervising Consultant
iii. contractor extracts material from borrow areas without the permission of the	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
Landowner.					
2.8 Contamination of Water Resources (Surface and Ground)					
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.9 Damage / disturbance to Utilities within RoW	<ul style="list-style-type: none"> i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services. 	Before the start of construction work. Design phase.	Where utilities services located	Contractor EHS Inspector	Supervising Consultant
2.10 Traffic Disturbance					
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor EHS Inspector	Supervising Consultant
2.11 Health and Safety Concerns					
<ul style="list-style-type: none"> i. Protecting the workforce and maintaining a safe working environment. ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local 	<ul style="list-style-type: none"> i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides. 	Construction period	Construction Camps, Construction sites and Asphalt Plant	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
community.	ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with masks of a micron size, capable of capturing dust down to 2 microns. iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment. v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD andSTI).		area		
2.12 Interruption /Contamination of Water channels					
	i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanism should be provided to avoid contamination. iii. Contractor should prepare traffic management plan, duly	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>				
2.13 Over Used Local Resources					
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
2.14 Contractor Good Housekeeping Practices not Applied					
	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection program must be established</p> <p>iii. Monitoring will be required for</p>	Throughout the construction period	All construction camps , work areas and contractor 'yards'	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>				
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD and Contractor	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	-
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed limits shall be monitored by the traffic police to avoid any accident and subsequent spillage. An emergency service may be provided by the local	Operation period	As per design	Contractor and Traffic police	ES/PMU /IA

EMiT

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	authorities.				

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY.	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP.	Before the tendering and before contract finalized.	Date and time that confirmation completed filed with PMU.	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage.	Monitor to obtain copy of plan and record compliance—for presentation in semi-annual audit report	Prior to start of construction .	Date and time that confirmation completed recorded and filed with PMU.	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done.</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and and compensation of losses Land owners will be compensated This will be monitored through ES-PMU .</p>	Monitor checks that topsoil management steps prepared and ready for implementation.	During Planning phase, in parallel with the preparation of bid documents.	Copy of topsoil protection actions.	PMU	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	There are no cultural or archaeological sites found in the Khyber to Sanghar road and thus no mitigation measures are required.	----	---	-----	----	-----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report.	Prior to contractor mobilization.	Written and dated note indicating compliance and inspection .	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside	The work along this road will affect the access from a business and residence to the	Review of plan and confirm a) consultation action	Completed prior to contractor mobilization and	Written and dated note indicating compliance.	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
landowners	road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access.	proposed b) inclusion of timetable and c) inclusion of clean up and reconnection action.	provided the contractor as part of the contract .documentation			
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment.	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites	i. The Contractor will be required spray water on unsealed roads and work areas daily, within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by	Travel work areas and check for dust—and if found take immediate action with contractor.	Anywhere where there is material moved, earthworks cutting and filling.	Written and dated note indicating compliance or issue and action taken.	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	watering, setting strict speed limits of no more than 30kph in or near settled areas.					
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted. 	<p>Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate action with contractor.</p> <p>Inspect batching plant dust suppression mechanism, its maintenance log book.</p>	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and action taken.	PMU	Supervision Consultant
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be 	<ul style="list-style-type: none"> i. Check query sites for depth. ii. Ensure contractor store topsoil properly, and restore query site as much as possible at end of work. iii. Ensure Land owner get adequate compensation 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken.	WSD	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	compensated as provided in agreements between the land owner and contractor.					
2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be kept to a minimum by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes and iv. Equipment maintenance specifications will be imposed through construction inspection and regular reporting. v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	Record findings and conduct regular inspections in association with construction supervision.	Throughout the construction period.	Inspection note to file for use in contractor reporting and in semi-annual audit report.	PMU	Supervision Consultant
2.5 Disposal of Spoil and Solid Waste						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor.	Throughout construction period.	Note to file, signed and dated.	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps	<p>i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective TMA Sanghar, and EPA Mirpurkhas.</p> <p>ii. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>	Monitor to check waste handling and disposal procedure of contractor.	Throughout construction period.	Note to file, signed and dated.	PMU	Supervision Consultant
2.6 Noise and Vibration						
i. Noise and Vibrations associated with earthworks and haul roads	i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road	Using a portable noise meter, monitor checks conditions , and inspects if work	Throughout construction period.	Inspection note, signed and dated.	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>for 500 m on either side of a village, Same approach is to be taken if the other site is used.</p> <p>ii. Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800.</p> <p>iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.</p>	conducted within permitted time period on urban zones.				
ii. Excessive Noise at sensitive sites, identified in IEE, i.e., schools, residential areas, mosques, health care centers	i. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE.	Noise measurements at these sites recorded by monitor and if excessing, immediate action to erect temporary barriers.	Throughout the construction period.	Inspection note with noise reading results.	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						
i. Overloading of trucks, damaging pavement, bridges, culverts etc	ii. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved.	Throughout construction period.	Inspection note re findings, dated and signed.	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations	iii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period.	Inspection note re findings, dated and signed.	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner	iv. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials.	Throughout construction period.	Inspection note re findings, dated and signed.		
2.8 Contamination of Water Resources (Surface and Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that</p>	Regular inspection of work camps, contractors yard, fueling areas, fuel storage	At least monthly throughout the construction period.	<p>Checklist showing check fuel and lubricant handling, waste oil management machinery was down water control, etc. signed and dated--filed.</p> <p>Checklist showing the check for lighting and signages signed and date filled.</p>	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing. iv. All diversions must be checked for Signages and lightings on weekly basis,	Regular monitoring of diversion for signages and lightings.	At least fortnightly where diversions are placed.			
2.9 Damage / disturbance to Utilities within RoW	i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.	Review of notifications and approvals from all utilities as per the legal requirements.	Before the start of construction work. Design phase.	Inspection note re findings, dated and signed.	PMU	Supervision Consultant
2.10 Traffic Disturbance						
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that	Inspect construction areas where access is an issue and establish if contractor is	Throughout construction period.	Inspection note re findings, dated and signed.	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	managing problem and if local residents are satisfied.				
2.11 Health and Safety Concerns						
<p>i. Protecting the workforce and maintaining a safe working environment</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment.</p> <p>ii. All Construction labour and staff of the contractor and consultant will briefed in STD's</p>	<p>Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement.</p>	<p>Throughout construction period.</p>	<p>Inspection note re findings, dated and signed.</p>	<p>PMU</p>	<p>Supervision Consultant</p>

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	and given option to be tested (personal choice).					
2.12 Interruption /Contamination of Water Sources						
	<ul style="list-style-type: none"> i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanism should be provided to avoid contamination. iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents. v. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed. 	<p>Inspection of diversion along the road, check signages, lighting any leakage etc at the diversion and rectify through contractor.</p> <p>Ensure contractor has adequately restored temporary land.</p>	Culverts and bridges	Contractor EHS Officer	IA /PMU	Supervision Consultant
2.13 Over Used Local Resources						
<ul style="list-style-type: none"> i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system. 	<ul style="list-style-type: none"> i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services. 	<p>Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern</p>	Throughout construction period—at least once when work is near or in a community	Meeting note signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
2.14 Contractor Good Housekeeping Practices not Applied	<ul style="list-style-type: none"> i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established ii. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. v. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation. 	Inspect all camp operations including worker housing and all waste management procedures.	Throughout the construction period while work camps are in operation.	Inspection note re findings, dated and signed.	PMU	Supervision Consultant
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released.	Obtain completion report and review for compliance.	1 month before the end of the construction period.	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement	WSD to take necessary action.	During the operation of the upgraded road—on a continuing	Note to file indicating status of this maintenance work	WSD	WSD

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.		basis			
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

Initial Environmental Examination

P46377-PAK
TA 8406-PAK
July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Sangar to Mirpurkhas Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

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Initial Environmental Examination

June 2015

TA 8406-PAK: Provincial Road Improvement Program:
Rehabilitation of the Sanghar to Mirpurkhas Road No. 4

Prepared by the Engineering Consultant International Pvt. Ltd (ECIL) for the Sindh Works and Services Department and Asian Development Bank.

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
CO	mg/m ³	Carbon monoxide
dBA	dB	Decibels (A measure of audible noise)
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
		Grievance Focal Person
GRM		Grievance Redress Mechanism
IEE		Initial Environmental Examination
IRI		International roughness index
km		kilometres
Km/h		Kilometres per hour
m		metres
mm		millimetres (1/000 metre)
masl		metres above sea level
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PEPA		Pakistan Environmental Protection Agency
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
SPEQS		Sindh Provincial Environmental Quality Standards
SO ₂		Sulphur dioxide
SPS 2009		ADB's 2009 Safeguard Policy Statement
		Site Specific Environmental Management Plan
TPM	micrograms /m ³	Suspended particulate matter, with particles ≥ 10 microns in size, and a danger to lungs. Also referred to as PM ₁₀
S-EPA		Sindh Environment Protection Agency

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 4, the 64 km Sanghar to Mirpurkhas Road which links the N5 at Khyber with the district administrative centre of Sanghar. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the

WSD and any contractors on the EMP and the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

No mosques, graveyards and other cultural sites are within or near this roadway and therefore no such features will be impacted. Only three trees need to be cut, while trees on the embankments will not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

The contractor will be required to prepare a Site Specific EMP (SSEMP), including a number of subplans addressing, traffic management, sewage, garbage and oil waste management and borrow site operation and demobilization of owned/operated by the contractor.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are minor and able to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP during all three project phases is estimated at Rs 52,913,542 including a 10% contingency.

II. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this aim, GoS requested a loan from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads.
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing a new asphaltic concrete base and riding surface. Other sections will be rehabilitated; involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated (Table 1) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as

Table 1 List of Selected Roads

Road sections	No.	Km	Km under ADB loan
Kandhkot – Jacobabad (01)	1	77	77
Jacobabad – Ratodero (02)	2	55	32
Khyber – Sanghar (03)	3	64	64
Sanghar – Mirpur Khas (04)	4	64	64
TM Khan – Badin (05)	5	67	67
Mirwah – Naukot (06)	6	64	53
Total		391	238

4. A separate IEE has been prepared for each road. This IEE is for Sanghar to Mirpurkhas (road number 4).

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner

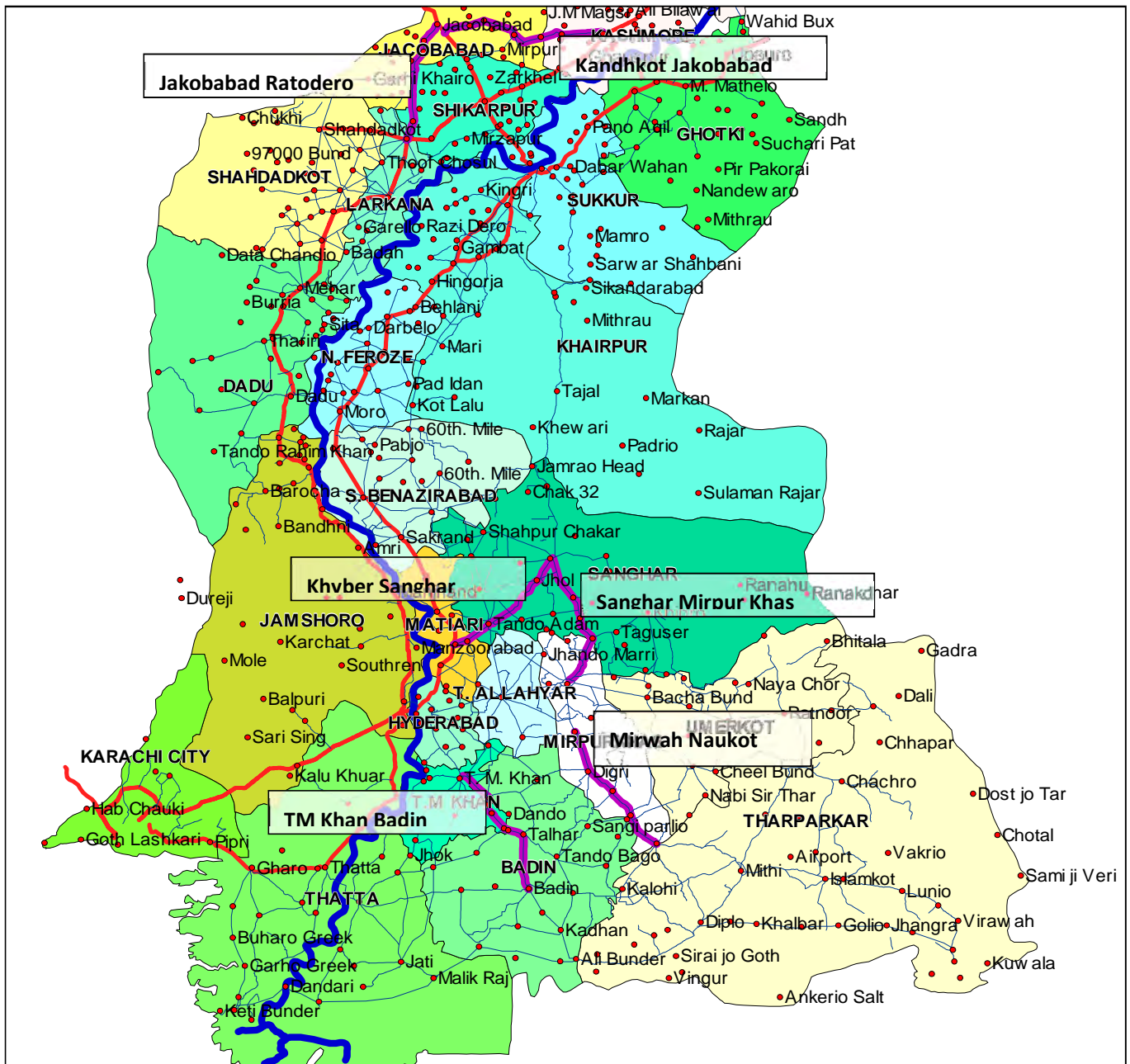


Figure 1 Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational.. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (S-EPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who must ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there will be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road’s physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project’s corridor of impact – generally considered to extend 15m each side of the

carriageway centreline – was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.

13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Legislative and regulatory requirements pertaining to the project were reviewed along with other available data and previous IEE/EIA studies conducted in the region. Studies reviewed included the following:

- Hyderabad Mirpurkhas Dual Carriage way Road Environmental Impact Assessment Study (Final Report); Prepared by Project Procurement International; October 2009.
- ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-Pak, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
- National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
- Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
- Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.
- Sindh Water Sector Improvement Program: Environmental Impact Assessment for Works on Khipro and Mithrao Canal. September 2012.

15. In addition, the following web sites were reviewed and relevant information is included in this report.

- <http://www.meowweather.com> date visited: September 2014
- www.pbs.gov.pk date visited: September 2014
- <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure, and action to either prevent or minimize negative effects, was identified and a monitoring requirement specified.

These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.

18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter **Error! Reference source not found.** and Annex -1.

III. PROJECT DESCRIPTION

A. Project Description

19. The project is to reconstruct the provincial highway that links the Sanghar and Mirpurkhas district centres. The road passes three provincial towns, Kandyari, Sindhri and Khipro.

B. Existing Condition of Project Road

20. This road has failed completely over most of the section between Sanghar and Sindhri. (43km) and requires urgent renewal. The section between Sindhri and Mirpurkhas has been repaired under the annual development plan but the pavement is already showing signs of failure, and the embankment has collapsed in some places.
21. A typical cross section also showing the existing road is shown as **Error! Reference source not found.**

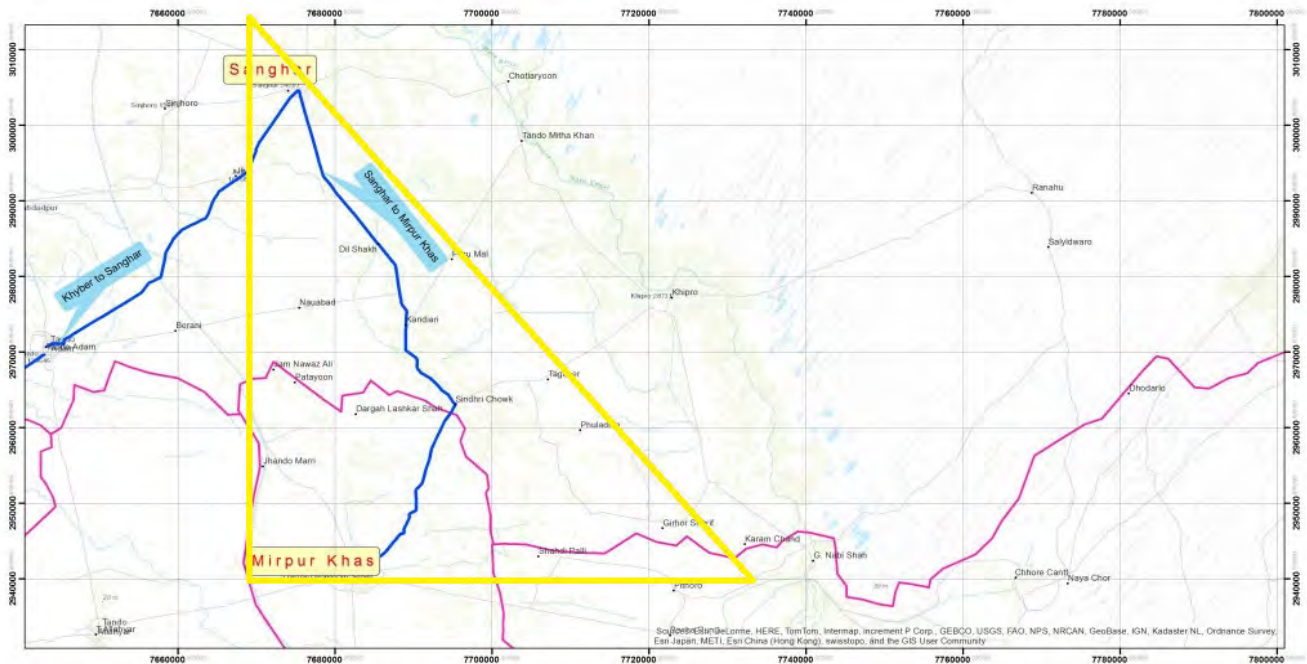
C. Re-Construction & Rehabilitation to be Undertaken

1. Scope of Work

22. The project design has allowed for the entire length of the Sanghar to Mirpurkhas road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides for either or both actions to be taken. A full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations are included in the EMP
23. The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centre line. Both rehabilitation and reconstruction within the existing carriageway are category B works.

2. Reconstruction of existing carriageway

24. Reconstruction work involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.



TA8406-PAK: PROVINCIAL ROADS IMPROVEMENT PROJECT SINDH PAKISTAN
SANGHAR TO MIRPUR KHASKHAS

0 5 10 20 30 40 Kilometers

Legend

- Project Roads
- National_Highway
- Districts Boundary

Figure 2 Pakistan showing the location of the Project road

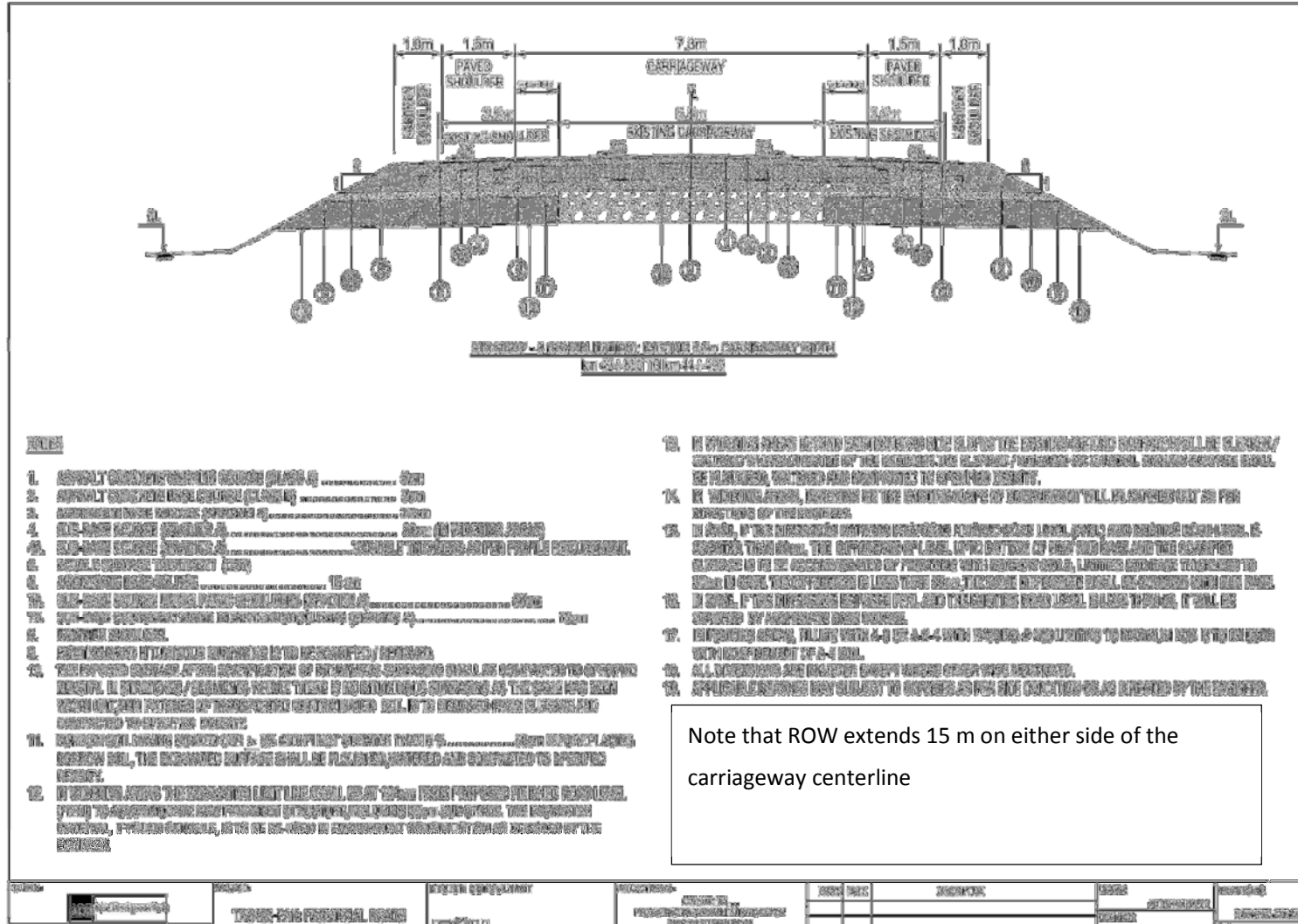


Figure 3 Typical Cross Section

25. The main steps involved in reconstructing a section of road are:

- i. Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- ii. Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- iii. Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- iv. Use recycled or new crushed aggregate to provide a compacted aggregate base course over the width of the pavement (depth may vary as per profile)
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

3. Rehabilitation (Overlay)

26. Rehabilitation involves scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses. The key steps are:

- i. Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- ii. Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- iii. Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- iv. Scarify existing bituminous surfacing. Material removed is to be transported to an approved disposal site.
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

4. Rectification of Bridges

27. The process for bridges is as follows:
28. Preparation of a complete bridge inventory
 - Cleaning of all concrete surfaces including girders and transoms.
 - Providing plaster to guardrails and posts including curbs wherever necessary.
 - Cleaning expansion joints.
 - Repairing training works wherever necessary
 - New Deck construction (as & where required depending upon the deteriorated condition of Deck slab).
29. Only one bridge requires repair, this is located at chainage (44+675).

5. Reconstruction and Rehabilitation of Culverts

30. Many of the culverts are blocked, damaged or are inadequate. Where the road is to be widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary diversion or to close one side of the road at a time and institute traffic controls. Restitution of the road will follow the steps outlined in section III.C.2 above. It may also be necessary to provide a temporary diversion for the water channel. Ideally the work will be done in dry season when water flows are minimal.
31. The steps for repairing or replacing culverts is as follows:
32. All vegetation shall be removed from culvert inlet and outlet up to 5m, from either side.
33. Where water channels have to be diverted or construction, this will be done during the dry season and new culverts will be placed on a 30 cm thick sand cushion.
34. Where culverts needs extension, provide a 300 mmm sand cushion and place lean concrete as a base,
35. New reinforced concrete slab culvert to be provided as per the drawings, Re decking of culverts as and where applicable
36. The masonry side walls shall be deep pointed including replacement of parts of masonry which has deteriorated and re-laid with good quality bricks and mortar.
37. In the base slab all pitting shall be rectified by providing bonding agent and a 75mm thick concrete cover with 10mm diameter bars placed at 250mm centres. Anchor bars shall be drilled into the base slab. The anchor bars shall be 13 mm diameter placed 600 mm centres and drilled 150mm into the base slab.
38. The top slab shall be examined for any cracks which shall be repaired with epoxy injection.
39. Where the concrete cover has broken and steel reinforcing is exposed, the area shall be marked and all rusted reinforcement shall be removed and replaced by better quality new steel of the same size and area and nailed to the concrete surface. In such areas, concrete shall be chipped to at least 75mm in thickness, a bonding agent shall be applied and concrete shall be applied in the form of plaster. Steel rods 15mm in diameter shall be drilled into the old concrete at 450mm centres and grouted.

40. After rectification work is carried out all the areas shall be coated with a polymer reinforced cementitious waterproofing compound.
41. The roadway and shoulders shall be restored following section III.C.2 above.

D. Construction Materials

42. Construction materials require transportation from the source to the work site as follows.
43. **Stone-** Stone for base course is available at Kotri quarry, which lies at a distance of 90 Km from Mirpurkhas via Hyderabad –Mirpurkhas expressway. It can be supplemented from Ganja quarry which is at a distance 85 from Mirpurkhas.
44. **Bitumen-** The National Refinery Karachi (232 km from Mirpurkhas) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source.
45. **Cement** - There are quite a few cement factories in the vicinity of project road, namely Zeal Pak Cement Factory in Hyderabad (85 km from Mirpurkhas), Lucky Cement Limited and Power Cement Factory in Nooriabad (85 km from Khyber).
46. **Sand-**Good quality of sand is available at Bollori which is 15 Km beyond Kotri quarry as well as from Jamshoro which is in the vicinity of Hyderabad ((70 km from Mirpurkhas). There are other quarry sites available in the sub-project area which can be utilized. These are all within 80 km of where road maintenance and rehabilitation will take place.
47. **Steel Reinforcement (Rebar)-** The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:
 - Mehran Mills
 - Islam Mills
 - Hyderabad Mills
48. The distance from Hyderabad mills to Mirpurkhas, the project start location is about 75-85 kilometres.
49. **Aggregate and Concrete** - Crushed stone aggregate for concrete is available in Nooriabad, Jamshoro, Petaro, all between 85 and 140 kilometres from the road.
 - Crushed Aggregate for Asphalt Concrete Petaro Quarry
 - Sub Base (Muram) Kotri Quarry
 - Aggregate Base Course Petaro Quarry
 - River Sand From Indus River Basin
50. **Bricks-** The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.
51. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation & Drainage Authority. While the amount of water required is considerable, it is should be negligible when

compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 12 to 14 meters.

52. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.

Option 1: Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.

Option 2: Waste material can be used to refill borrow pits and covered with topsoil¹

Option 3: Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.

53. The total quantity of material to be disposed of is estimated to be 21,530m³.

¹ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

IV. DESCRIPTION OF ENVIRONMENT

54. The description of the environment of the project roads requires baseline data on the following:

- Physical Environment
- Ecological Resources
- Socioeconomic Environment

A. Physical Environment

1. Topography

55. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South. The Sanghar to Mirpurkhas road lies in the central alluvial plain.

2. Soils

56. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in the Nara and Jamrao Canal command area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread, but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.

57. The alluvial deposits date back to the time when the Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

58. The seasons in Pakistan can be best classified as

- Winter, from December to March
- Pre-monsoon (summer), April and May
- Monsoon, from June to September
- Post-monsoon, from October to November
- Summer season runs from April until October and winter runs from November to March.

59. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, but largely escapes the influence of both, resulting in a rainfall of only 150 to 180 mm per year.

² site visited on dated 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on dated 18.01.2015

60. For the Sanghar to Mirpurkhas road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in Table 2.

Table 2 Average Air Temperature and Precipitation in Mirpurkhas and Sanghar³

Month	Mirpurkhas			Sanghar		
	Temperature °C		Precipitation (mm)	Temperature °C		Precipitation (mm)
	Minimum	Maximum		Maximum	Minimum	
January	5.42	26.49	0.62	24	6.8	2
February	8.71	29.16	1.96	27.9	9.9	0.7
March	14.29	34.52	4.55	33.7	15.3	2.4
April	20.12	39.12	3.50	39.8	20	5.4
May	24.50	41.49	2.97	44.1	25.2	0.4
June	27.17	39.72	19.74	43.3	28	4.2
July	26.82	36.19	79.03	40.3	27.7	37.4
August	25.73	34.51	74.59	38.8	26.4	21.3
September	23.88	35.70	82.95	38.6	24.6	1.5
October	18.54	37.12	2.07	37.4	19.3	1.3
November	11.89	32.98	3.57	32	13.2	2.5
December	6.62	27.95	0.90	25.6	8.6	4.8

61.

4. Air Quality and Noise

62. The Sanghar to Mirpurkhas road is located in a rural area and human activity is primarily related to agriculture with the major air quality issue being particulate matter (PM₁₀) due to heavy dust which occurs due to the very dry and windy conditions. The situation is aggravated by human activity such as cultivation of the fields. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.

63. Since WSD has not yet established its own environmental monitoring capacity, there is no comprehensive air quality and traffic noise monitoring data available. However, data is available from studies relating to the construction of the Hyderabad- Mirpurkhas road, the sampling points for these studies are located between 30 and 35 kilometres to the south of the project road (Table 3).

Table 3 Ambient Air Quality – Hyderabad – Mirpurkhas road⁴

S.NO	Test Method	Parameter	Units	Sample Location		GoP Standards (NEQS)
				Tando Allahyar	Tando Jam	
1	By Analyzer	Particulate Matter (PM ₁₀)	mg/m ³	0.967	0.539	0.150
2.	ISO-4221	Oxides of sulfur	mg/m ³	0.023	0.036	0.120

³<http://www.meoweather.com> site visited September 2014

⁴ EIA Mirpurkhas-Hyderabad dual Carriageway Units converted from ug/m³ and ppm to mg/Nm³

		(SOx)				
3.	ISO-6768	Oxides of nitrogen(NOx)	mg/m ³	0.031	0.045	0.040
4	By analyzer	Carbon dioxide (CO2)	mg/m ³	546	701	----

64. Traffic volume is low and the adjacent land use is primarily agricultural. Both road and ambient noise levels increase when the project road enters into a town. Data for Tando Jam and Tando Allahyar on the Hyderabad – Mirpurkhas, two small to medium sized towns along a nearby provincial highway and are considered typical of the expected conditions (Table 4). These noise levels exceed commercial areas NEQS /GoP Standards in day time limits but are within an acceptable range for Pakistan transport corridors.

Table 4: Noise intensity in medium-sized towns⁵

Location	Noise intensity dBA	NEQS/GoP Standard	
		Day	Night
Tando Allahyar	72	65	55
Tando Jam	82	65	55

5. Hydrology

65. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps in use. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies from 3 meters to 25 meters along the route. Sanghar district is irrigated by the canals from the Guddu and Sukkur barrage system or by tube wells in areas not served by the canal network. There are three major canals, seven minor canals and thirty six water courses crossed by the Sanghar to Mirpurkhas road. These water sources run the entire year and are the major source of drinking water as well as water for irrigation.

66. Excessive irrigation and seepage from canals has caused water logging and salinization problems near Sanghar. Recent floods have exacerbated this problem, since farmers have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface.

6. Seismicity

67. According to the seismic zone map of Pakistan, the Project Area lies in the zone where minor to moderate damage can occur as shown in Figure 4

⁵ EIA Mirpurkhas-Hyderabad dual Carriageway

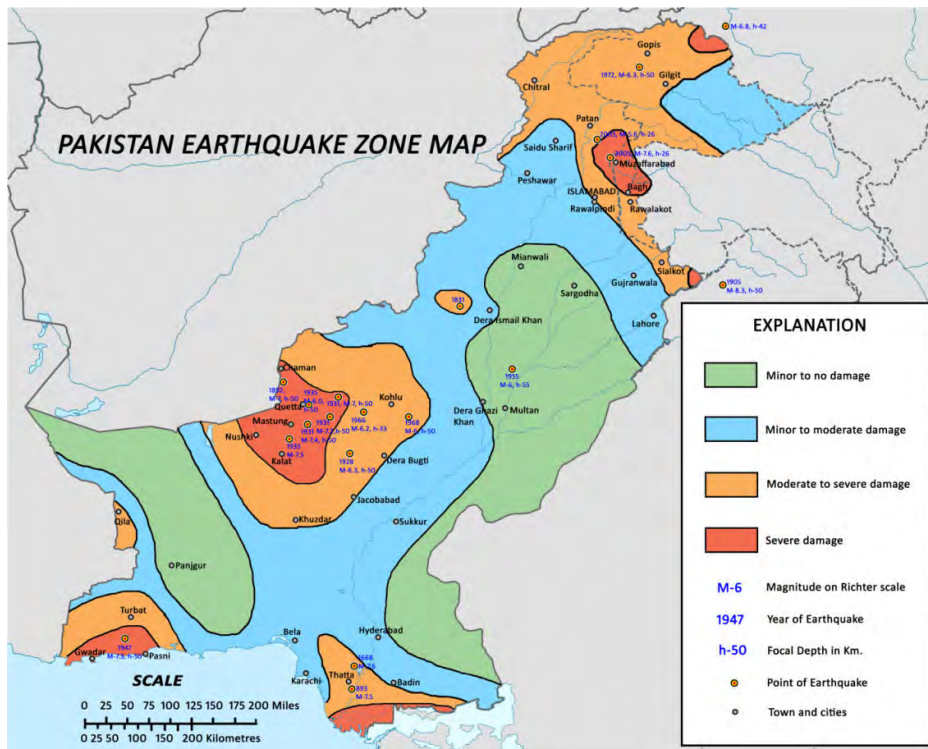


Figure 4 Pakistan Earthquake Zones

7. Archaeological and Cultural Resources

68. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.

69. Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Twenty five mosques, two graveyards and four shrines were identified as being potentially affected by the proposed work on the Sanghar to Mirpurkhas road. A detailed inventory of the sites showing the approximate location of the structures is provided in Table 5. By applying careful highway design all potential impacts were avoided. However care will need to be taken during construction activity.

Table 5 List of Archaeological and Cultural Resources impinging on the ROW

S#	Road name	0-10			11-20			21-30			31-40			41-50			51-60			61-70		
		M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G			
1	SGR-MPK	0	0	0	1	0	1	0	0	0	0	0	0	2	0	0	3	0	0	2	1	1
Total		Mosque =8, Shrines 1 and Graveyards 2																				

Note: M=Mosque S=Shrine G=Graveyard

B. Ecological Resources

70. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

71. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.
72. The dominant trees in lower Sindh are babul (*Populus euphratica*), ber (*Zizyphus numularia*) and several varieties of *Tamarix* such as plai (*Tamarix gallica*) and jhao (*Tamarix dioica*), talhi (*Dalbergia sisoo*), kri (*Tamarix gallica*), karir (*Coparris aphylla*).
73. Of more concern would be damage to old plantations of *Azadirachta indica* (Neem), *Albizia lebbek* (Shrin), *Ficus religiosa* (Peepal), *Acacia nilotica* (Babul), *Cordia myxa* (Lasura) and *Ficus benghalensis* (Borh), and recent plantation of *Cornucopias*. These trees have significant medicinal value or are important culturally.
74. Among the grasses; Lumb (*Arislida depressa*), Chemmer (*Eleusine compressa*), Gorkha (*Lasiurus indicus*) and Kana (*Saccharum bengalensis*) are found in the Project Area. Koondeor Dib (*Typha augustata*) is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

75. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.
76. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

77. Reptiles include snakes such as cobra (*Naja naja*), rattlesnakes (*Crotalus horridus*) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (*Varanus* sp.), spiny tailed lizard (*Uromatis hardwickii*) and fringed toed lizard (*Acanthodactylus contoris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

78. Important bird species found in the project area are the common crow (*Corvus brachyrhynchos*), common mynah (*Acridotheres tristis*), house sparrow (*Passer domesticus*) and common teal (*Anas crecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdix perdix* and *Melanoperdix niger*), though

present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coracias benghalensis*), crested lark (*Galerida cristata*), vultures (several varieties) and quail. White heron (*Ardea alba*) and black heron (*Egretta ardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconia ciconia*), white pelican (*Pelecanus onocrotalus*), little brown dove (*Spilopelia senegalensis*) and white throated king fisher (*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

79. There are no wildlife sanctuaries or national parks or game reserves located in the project area.
80. The Sindh Wildlife Department recognizes 13 game reserves in Sindh province, the closest is Sonhari Lake, some 17.8 km East of the road.
81. The Nara desert provides refuge to a large number of wildlife in Sind province. The Nara Canal Area, a chain of some 200 small, permanent and seasonal, freshwater, brackish and saline lakes and marshes stretching for about 150 km along either side of the Nara Canal from Sorah in the north to Sanghar in the south is known to be of great importance for wintering waterfowl and other wildlife. The Nara desert area is 30 kilometres to the north of the road and reconstruction of the project road will have no impact.
82. The nearest wetlands area is the Chotiari water reservoir, some 35 kilometres north-east of the road corridor.

F. Socio-Economic Environment

1. Road Transport

83. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. There data show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in Table 6.

Table 6 Twenty four hour Traffic count (number of vehicles) along subproject road

Location	Motorcycle	Car/ 4wd	Rick shaw	Vans/ PU	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
Sanghar - Sindhri	1731	454	718	337	4	33	62	41	16	4	47	3445
Sindhri - Mirpur Khas	5863	1279	1572	995	88	69	182	122	19	11	48	10249

84. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons. The Consultant met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to include approximately 170 heavy vehicles a day (mainly 2,3 axle trucks, and tractor-trailers); in the Sanghar to Sindhri Section; whereas

382 heavy vehicles were counted at Sindhri- Mirpurkhas section twice the number surveyed in June.

2. Structures Affected

85. During the topographic survey a small number of structures were found in the Sanghar to Mirpurkhas road RoW. None of these have encroached on the pavement, but some structures are within the paved or unpaved shoulders (including those shown in Table 5). These encroachments are illegal but if people are moved or cultivated land is taken, compensation under SPS 2009 and ADB's Involuntary Resettlement Guidelines is nevertheless required. Resettlement is the subject of a separate land acquisition and resettlement plan (LARP).

3. Drinking Water

86. During the survey it was learnt that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location, with areas close to irrigational canals having comparatively better quality water while water in some other areas is saline.

4. Industrial and Commercial Activities

87. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, Cotton ginning and flour mills. There are also some brick kilns.

5. Employment and Income Sources in Project Area

88. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

89. Agricultural lands are owned by landlords and farmers work for a share of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves. They graze cattle and grow vegetables for food.

90. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.

91. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.

92. According to baseline surveys, agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers and kiosk holders, small business and as labourers in the sugar, cotton and rice industry and 5% are in government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.⁶

6. Demography

93. The project road is located in the two districts Sanghar and Mirpurkhas districts, and the demography is diverse (Table 7).

Table 7 Demography of the Subproject road Sanghar to Mirpurkhas⁷

Factor	Sanghar	Mirpurkhas
Area sq.kms	10608	2925
Population (Persons)	1421977	905935
Male	746127(47.52 %)	471096(52.00%)
Female	675850(47.52%)	434839(48.00%)
Sex ratio (M:F)	110.4:100	108.3:100
Population Density	134 per km ²	309.7 per km ²
Urban Population	331,316 (23.29%)	300175(33.13%)
Rural Population	1, 090, 6610 (76.7%)	605760(66.87%)
Avg Household size (People)	5.8	6.1
Literacy ratio 10+	31.0%	36.0%
Male	42.88%	45.99%
Female	17.45%	25.05%

94. Tribal people include Bugti, Bheel, Chandio, Jamali, Khoso, Kolhi, JunejoLeghari, Lashari, Hingoro, Mangrio, Joyo, Rind, Burdi, Syed, Solangi and Hingorno,. Sindhi language is commonly spoken as mother tongue of majority of the communities in the project area. However, Balochi, Urdu, Marwari, Punjabi and Siraiki languages are also spoken and understood as local languages.

7. Archaeological, Cultural and Historical Resources

95. There are no archaeological, cultural or historical resources in this corridor and none will be impacted by any of the work activities.

⁶ Project of Sindh Irrigation and Drainage Authority EIA report for Works on Khipro and Mithrao Canal; September 2012

⁷ www.pbs.gov.pk
<http://dearsir.pk>

V. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design and Pre-Construction Phase Impacts

1. Lack of Environmental Capacity

a) Description

96. During the field surveys it became clear that the provincial and district government officials who will be charged with overseeing the construction are unfamiliar with the environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented is low.

b) Mitigation Measure

97. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use

2. Lack of Integration of IEE/EMP Requirements into Construction Bid Documents

a) Description

98. The Bidding documents should reflect the requirement to select a qualified and experienced contractor. Bidding documents has greater emphasis on the methodology on the protection with regards to environmental and social worksite management. The bidder's environmental, social and safety methodology shows material deviation, reservation or omission towards environmental, social and safety specification.

b) Mitigation Measures

99. PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.

3. Loss of Vegetation and Trees

a) Description

100. There are various trees located on the both sides of the Mirpurkhas Sanghar road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to meet road safety standards. There will be loss of vegetation in some

locations, but always within the road ROW According to the LARP report section 1 Table 1.1 three mature trees will be cut to pave the way for the required width of carriageway

b) Mitigation Measures

101. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every tree cut down ,and which is more than 10cm Diameter Breast Height (DBH) .

4. Top Soil Erosion

a) Description

102. The top soil of RoW needs to excavate for reconstruction of the proposed project structure. It will erode and cause disruption local community and vehicle traveller as soil particles displaced and transported easily in air, water and may affect wide range of community assets.

b) Mitigation Measures

103. Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.

5. Disturbance to Archaeological and Cultural Sites

104. There are no cultural or archaeological sites found in the Sanghar to Mirpurkhas road and thus no mitigation measures are required.

6. Material Haul Routes

a) Description

105. Hauling of material have significant impacts on the community, public safety, traffic congestion, air quality and lifespan of the town road ways.

b) Mitigation Measures

106. Construction vehicles hauling materials along urban roads and anywhere where there are road side residence will be limited and the WSD will establish a route plan to minimize this disruption.

7. Consultation Plan with affected roadside landowners

a) Description

107. The road side and landowner may come across in relation to the road side schedule in installation of new fence, rubbish dumping, weed control and feral animal control which may cause disruption to the road side landowners.

b) Mitigation Measures

108. Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.

8. Contractor's Environmental safeguards Capacity

a) Description

109. The responsibilities of safeguards unit reviews and finalize the document relating to environmental issues. Contractor with less capacity of safeguards do not comply with workplace environmental, social and safety regulations.

b) Mitigation Measures

110. Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

111. A small increase in particulate matter (dust) is expected within construction air shed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

112. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii) spraying of water on unsealed roads and work areas within villages and past houses

located close to the road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

113. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plant, require cement and dry sand a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust in emitted when bagged cement is loaded manually into the batch plant hopper, as well as with the conveyor system bringing the materials to the plant.

b) Mitigation Measure

114. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted

3. Topsoil Erosion

a) Description

115. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

116. Excavation of earth fill will be limited to an appropriate depth of 20cm. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

117. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

118. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with twelve months of the

start of the work. Secondly no construction vehicles will be left idling for more than two minutes.

5. Disposal of Spoil and Solid Waste

a) Description

119. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.

a) Mitigation Measures

120. The asphalt and base course removed from the existing road will be recycled⁸. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverised, spread on access roads and compacted.

121. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective Taluka Municipal Association (TMA) Sanghar, Mirpurkhas, and EPA Mirpurkhas.

122. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

6. Noise and Vibration

a) Description

123. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.

124. Vibration will occur during compaction when vibratory rollers are used to compact subgrade materials. This is unlikely to cause permanent damage.

b) Mitigation Measures

125. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured against the Sindh Provincial and Pakistan

⁸ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

National Environmental Quality Standards . Exceedances of these standards will require immediate noise reduction measures such as baffles and barriers.

7. Quarry /Borrow Material

a) Description

126. Transport of construction material (aggregate and fill) may raise environmental and social issues with the possibility of damage to bridges and pavements if vehicles are overloaded.
127. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

128. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.
129. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Borrow material must be taken only with the consent of the land owner and if the contractor is found to be in violation, will be fined in addition to having to completely rehabilitate and re-vegetate the site(s).
130. Other borrow material must be taken only with the consent of the land owner, and must be in compliance with provincial environmental regulations. If found to be in violation of existing regulations, the contractor will be fined and be required to completely rehabilitate and re-vegetate the site(s).
131. The contractor will ensure that the removal of productive agriculture land and soil cover (vegetation) is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

132. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.
133. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.
134. During rehabilitation work on culverts and bridges the canals and water courses crossed the Sanghar to Mirpurkhas road, could become polluted by accidental discharge of cement and other chemicals like epoxy and paints.

b) Mitigation Measures

135. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA approved site. New soil should be brought in as required so that the ground surface is re-established.
136. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.
137. Water channels must be diverted properly and a protection mechanism provided. Alternatively construction should be undertaken during the dry season.
138. Surface water in channels will be monitored against "irrigation water quality standards" of Water and Power Development Authority, WAPDA. Ground water quality use for human consumption will be monitored against the National Drinking Water Quality Standards.

9. Damage / disturbance to Utilities Services**a) Description**

139. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

140. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance**a) Description**

141. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

142. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

143. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitos and rodents.
144. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.
145. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.
146. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

147. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or let enter streams where it can affect downstream water quality, aquatic environments and human health.
148. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.
149. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area were cement dust is in the air.
150. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to insure compliance with the requirement of dust masks.

12. Interruption/ Contamination of Water channels

a) Description

151. There are forty two watercourses crossing the project road: details were given in table 5. Repair or replacement of the crossing will often require temporary diversion of,

or work within, the watercourse. This could affect the water supply to agriculture land of communities living nearby, and could lead to contamination.

152. Temporary traffic diversions disrupt and can be a danger to traffic.

b) Mitigation Measure

153. Where water crossings are being repaired. The water channel should be diverted or a protection mechanism provided to avoid contamination. Where possible, construction will be made in dry season.

154. The contractor should provide an adequate sized diversion so that there shall be no disturbance to water flows of canal /water course.

155. A traffic management plan shall be provided by the contractor. Signage and lighting may also be provided to reduce the likelihood of accidents.

156. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed.

13. Burden on Local Resources

a) Description

157. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife. The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

158. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

14. Inadequate Camp Site Good Housekeeping

a) Description

159. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

160. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.

- Train work force in storage and handling of materials
 - Fire fighting
 - Camp sewage will be treated in pit latrines or septic tanks which will be drained and sewage taken to a sewage treatment plant for processing. The treatment/management will be done according to the provision defined in the Pakistan EPA-specifications, which the contractor will have to become familiar with. Disposal will be recorded in a table and submitted as part of the semi-annual reporting to ADB.
161. Contractor will prepare as part of site specific EMP the following special sub-plans:
- Traffic management plan-addressing construction related delays and a protocol for day-to-day management. Traffic management is also addressed in the contract specifications for the engineering works.
 - Waste management plan specifying the treatment and disposal of garbage, sewage and oily waste at the contractor's camps and yards.
 - Borrow site management plan –addressing preparation of access roads and decommissioning following use, of any borrow sites opened by the contractor. Operating licensed facilities will not be included in this management plan, as they are already monitoring by the authorities.
162. The SSEMP, together with the sub-plans will be approved by the executing agency as well as the ADB, prior to the contractor mobilizing to the field

C. Operation Phase Impacts

163. Most of the impacts at the operation stage are positive and do not require mitigation. These include:
- Improved access to markets
 - Reduced travel times
 - Lower vehicle operating costs
 - Reduced dust

164. However there are some negative impacts and these are listed in the following sections.

1. Lack of Environmental Safeguards

a) Description

165. .

b) Mitigation Measure

166. While the proposed project will be completed adhering to environmental safeguards measured defined in the EMP and GoP standards, the contractor has to ensure the action taken during all stages are in compliance with this EMP.
167. The contractor will provide mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released.

2. Increased Traffic Volumes

a) Description

168. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

169. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

3. Increased Risk of Accidents

a) Description

170. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.
171. The road design has had to balance the requirements of SPS 2009 to minimise displacement of encroachers and land acquisition against .road safety

b) Mitigation Measures

172. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.
173. Traffic police should be trained to more consistently enforce road rules.
174. One of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties should be sought.

VI. GRIEVANCE REDRESS MECHANISM

A. Organisation

175. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Sanghar to Mirpurkhas road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.
176. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, a Grievance Focal Person (GFP) who can be Community Leader, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.
177. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with appointed GFO prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessible to potentially affected persons through GFO.
178. Contact details will be distributed by the GRO to GFO in the appropriate local language, for posting in the village office.
179. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

180. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.
181. The first step (Figure 5) on receiving a grievance will be for the GFP to take up the issue with the GRO to refer the matter to the contractor, and given one week to respond to the grievance.
182. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.
183. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.

184. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.

185. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:

- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
- (ii) Updating the complaints database routinely;
- (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
- (iv) Collecting and submitting input for inclusion in progress reports for ADB.

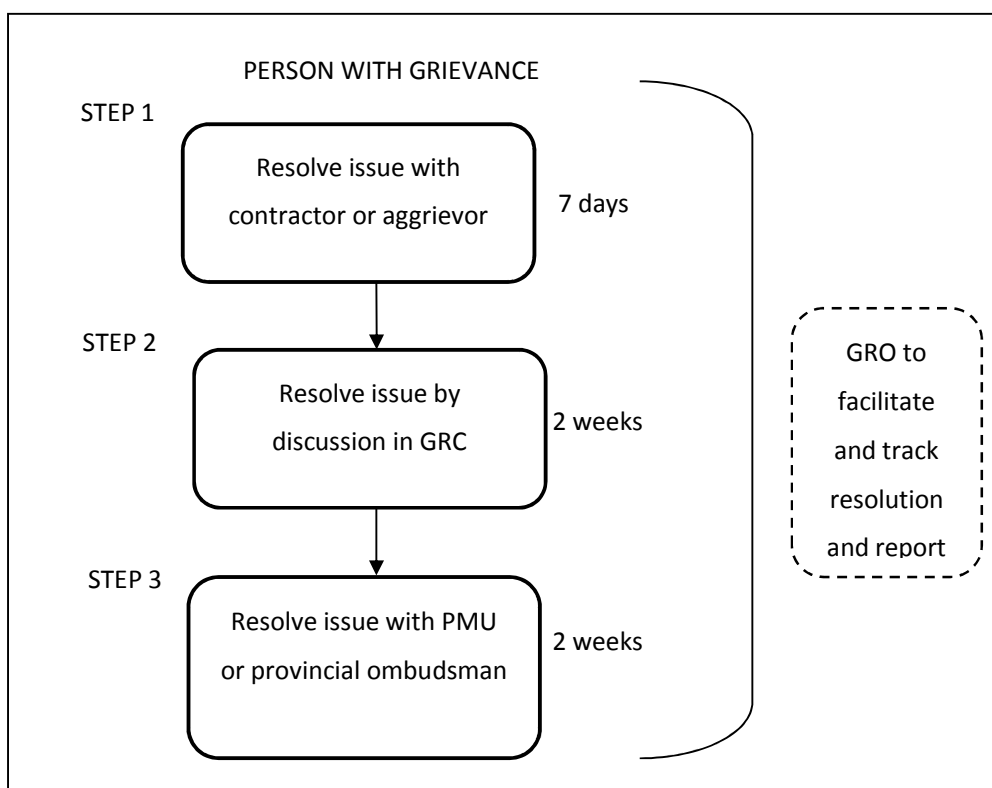


Figure 5. Steps of the Grievance Redress Process

VII. PUBLIC CONSULTATION

A. Objectives of Public Consultation

186. The overall objectives of the consultation process were as follows:
- To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
 - To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
 - To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
 - To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

187. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Forest Department, Livestock Department, Sindh Environment Protection Agency, and the Deputy Commissioner Sanghar. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.
188. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

189. Community consultations consisted of formal and informal meetings at Mirpurkhas, Kandyari, Sindhri and Sanghar City. Meetings were conducted on dated 25th and 26th June 2014. The consultation exercise was conducted in both Sindhi and Urdu languages. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.
190. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.
191. The people interviewed (Table 10) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater

disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

192. A matrix of concerns raised by community members was prepared (Table 8). The register of attendance is provided as Table 9. Other people joined the discussions but declined to be identified. A pictorial record of the meetings is included as Annex -2. Note that residents in Sanghar were asked about both the Khyber -Sanghar and Sanghar -Mirpurkhas roads. Where relevant, their comments will be included in both IEE.

Table 8: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns raised by community	Remarks
Road design	Storm drainage should be provided at at Kandyari and Sindhri towns Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction / Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss in the urban areas during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early	Construction will be programmed to minimise the length of disruption at

Issues	Concerns raised by community	Remarks
	as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	any one point These issues will be addressed once road constructed

193. As appropriate these concerns have been incorporated into the EMP items and have been related to the appropriate WSD officers. They should be taken up by the safeguard specialist when appointed.

Table 9 General Public Interviewed During Public Consultation in relation to the Sanghar to Mirpurkhas Road

Name	Town/Village	Position /Occupation
Mr. Sajjad Malik	Mirpurkhas	Private Job
Mr. Zahid Hussain Jarwar	Mirpurkhas	Engineer at Unicol Industries
Mr. Manzoor Ali	Sindhri Town	Shopkeeper
Mr. Muhammad Malook	Sindhri Town	Farmer
Mr. Madad Ali	Kandyari	Farmer /Dairy farm
Mr. Anwar Ali	Kandyari	Farmer /Student
Mr. Sajjad Hussain	Sanghar	Private Job
Mr. Muzaffar Memon	Sanghar	Private Job
Mr. Nadir Shah	Sanghar	Private Job
Mr. Wajid Langha	Sanghar	Private Job

3. Government Agencies

194. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices (Table 10). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below. Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in Table 9. Pictures of the meetings are provided in Annex-2.

a) District Commissioner Mirpurkhas

195. A meeting for consultation with stakeholder was held with, District Commissioner Mirpurkhas, Mr. Usman Mehsood who is also heading the TMA of Mirpurkhas on dated 26.06.2014. He raised the following points after welcoming the proposed project activity in his area of jurisdiction. The meeting was held at DC Office Mirpurkhas. Their views are as under:

- He mentioned that with proposed project road economic activity will increase in the area, job creation opportunities will increase, Farm to market access of the area will be easy.
- He mentioned that there is no landfill site in the Mirpurkhas. Waste generated from the city is being dumped trenches.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.

- He suggested that ADB shall also bring projects for the Mirpurkhas city in the area of Municipal solid waste management, Wastewater treatment and Drinking water supply

b) Environment Protection Agency Sindh (Mirpurkhas Regional Office)

196. The Mirpurkhas office of the Sindh EPA is responsible for general environment protection in the project area. A meeting was held with the Deputy Director Mr. Shoib Rajput and his clerical staff on dated 27.06.2014. The main points are as follows:

- In general, the participants approved of the project and were of the opinion that there is dire need of this kind of project as the recent floods had badly damaged this road.
- A tree inventory shall be made before start of work, and tree plantation shall be carried out as per ADB Policy and local laws. A budget shall be kept for this purpose and specified in the BOQ and contract documents.
- Jobs shall be provided for locals during construction and operation phase
- Contractor shall dispose the hazardous waste through EPA certified contractors.
- Due to unavailability of Safe drinking water Hepatitis C is spreading in the region.
- There is no proper landfill site in the project area (Mirpurkhas and Sanghar) A dumping site for any non-hazardous waste will be indicated to the contractor jointly by the EPA Office and local TMA.
- Currently 75% of solid waste is left unattended. The leftover material is being openly burnt which is causing health issues.

c) District Forest Office Mirpurkhas and Sanghar

197. A consultation meeting was held with Mr. Shahzad Saddiq Gill District Forest Officer (DFO Mirpurkhas), Mr. Abdul Rasheed Range Officer Mirpurkhas on dated 25.06.2014 and Mr Gul Junejo (DFO Sanghar) on dated 26.06.2014 to discuss environmental issues related to the proposed project. The consultant team provided information about the proposed project with the help of the project area map and requested the officers to identify any protected forest or other concerns of the Department. A set questionnaire was also filled during the meetings. During the meeting the DFO expressed some reservation regarding the project. Their views and answers are re-produced as follows.

- He appreciated the project activities; and thought this kind of project will increase the employment opportunities in the area and increate business opportunities.
- He also said that this project will reduce the travel time, and energy of locals as the current road condition is poor.
- He also said this kind of project will help to shift the demand of wood, when people of the area get the gas they will not burn wood as fuel.
- He said the reserved forest of the area should not be disturbed at all and he mentioned that Khipro Forest is the only protected forest of the area.

- The Range Officer mentioned that the Forest Department has planted some 865 cornucopias trees of along the project road. They should be protected, or if cutting is unavoidable, re planting shall be carried out as per local law.

d) Municipal Administration & District Commissioner Sanghar

198. A meeting was held with Additional Deputy Commissioner II, Mr Dedar Hussain Baloch and Mr Lal Khan acting TMO. The meeting was held at the Additional Deputy Commissioner's office at Sanghar on dated 25.06.2014. After welcoming the project, he and the TMA Sanghar representative raised the following points.

- Generally they supported the project and were of the opinion that there is dire need of these kinds of project shall be started as soon as possible.
- There is no proper landfill site in Sanghar City. Waste is being dumped in six local ditches which are nearly full. He also mentioned that currently TMA has insufficient equipment for the solid waste collection.
- Wastewater from the city is being dumped into seepage drains. There is no wastewater treatment plant in the city.
- Local people should get preferential treatment for the employment on the project;
- A suitable alternate route should be made available during project execution;
- Sugar-cane traffic will need to be managed in the area of Sanghar Sugar mill.

4. Non-Government Organizations

199. After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development and were consulted for this project on dated 27.06.2014. Mr. Muhammad Hussain from the NGO HANDS made the following comments and suggestions;

- As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- Better road conditions will reduce the rate of accidents around the sugar mills
- Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.

C. List of Public and NGO Sector Stakeholders Consulted

200. A number of stakeholders, other than the general public, who are likely to benefitted or be involved during the project execution phase, were also consulted (.Table 10).

Table 10 List of Stakeholders Consulted for Sanghar to Mirpurkhas road

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Shoib Rajput	Provincial Government	Deputy Director EPA Sindh

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Muhammad Usman Mehsood	District Government	DCO. District and Town Municipal Administration MPK
Mr Shahzad Saddiq Gil	Provincial Government	Divisional Forest Officer Mirpurkhas
Mr. Gul Junejo	Provincial Government	Divisional Forest Officer Sanghar
Mr. Abdul Rasheed	Provincial Government	Range Forest Officer Mirpurkhas
Mr. Dedar Hussain Baloch	District Government	District Municipal Administration Sanghar
Mr. Lal Khan	District Government	Acting Taluka Municipal Officer
Mr. Muhammad Hussain	NGO	HANDS (NGO)

VIII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

201. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects-monitoring mechanism, defined in the EMP's two action tables.

B. Environmental Management Plan for Sanghar to Mirpurkhas Road

202. The EMP's, mitigation and monitoring tables for the Sanghar to Mirpurkhas road are included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs (**Error! Reference source not found.**) will be used to prepare a specific environmental safeguards section in the construction Bill Of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

203. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

204. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential negative impacts. The value of the environmental assessment process can be undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

205. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20m-25m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.
206. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.
207. A Site specific EMP (SSEMP) is to be prepared by the contractor, based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.
208. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.
209. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

210. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which need to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit (ESU) (a section within the PMU) will be mainly responsible for implementing the EMP.
211. There are fourteen Construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and

people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

3. Operating Phase

Table 11. EMP Mitigation and Monitoring Implementation Cost Estimate

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 193 persons)			981,000	981,000	1962,000
Generators & Construction Machinery Noise Monitoring	7000	85	7,140,000	7,140,000	14,280,000
Drinking Water Quality Monitoring (During Const)	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	8000	193	1544000	-----	150,44000
Personal Protective Equipment(for 200 persons approx) replacing every year)		210	1179250	1179250	2358500
Fire Fighting Equipment purchase and refilling		30	250,000	100,000	350,000
Health & Hygiene	--	--	741360	741360	1482720
Noise Meter	25000	2	50,000	----	50,000
Canal Monitoring (Pre-Const, During Const,) 1 month for pre-cons + 24 month of Construction	4,000	42	2,016,000	2,016,000	4,032,000
Ambient Air Monitoring (Pre-Const, During Const,) Three Places (Two towns + Asphalt plant) on monthly basis.	27000	36	972,000	972,000	1944,000
Noise Monitoring (Pre-Const, During Const,) monthly basis at 15 sensitive locations	750	20	180,000	180,000	360,000
Environmental Officer Salary	150,000	1	1800,000	1800,000	3600,000
Environmental Inspector Salary	100,000	1	1200,000	1200,000	2400,000
Contingency					48,103,220
Total					52,913,542.00

212. Operation period actions focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. All the work proposed is on existing roads and confined to the existing RoW. There will be some increase in the

speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2). Speed limits will be monitored through traffic police as discussed earlier.

213. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:

- Less travelling time
- Quicker access to Market
- Fuel efficiency
- Less dust generation
- Safer journeys

C. Cost Estimates

214. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs and monitoring visits, training costs, etc. Table 11 shows the cost to be included in the BOQ items by the contractor.

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

215. The Sindh provincial road improvement project will be coordinated by the Works and Services Department as an executing agency (EA) with a project management unit (PMU) established within WSD as Implementation Agency. The PMU will be self-sufficient to monitor the environment related issues.

216. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

217. The Project Management consultant (PMC) will support all Deputy Directors and PMU for project development. The PMC's environment experts will support the ESU in ensuring that project roads comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 (Table 12.)

Table 12 Implementation Organisation for Road Reconstruction and Rehabilitation

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International (ECIL)
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

218. The ESU will, with assistance from of the PMC environmental specialist:
- Prepare environmental screening checklists;
 - Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
 - Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
 - Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
 - Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors;
 - Ensure that the required environmental training is provided to the staff concerned;
219. Contractor will hire two full time persons to address the environmental safeguards; Environmental Engineer's responsibilities will include;
- Prepare Site specific EMP as per generic EMP of this road.
 - Monitor the work and undertaken the monthly reporting.
 - Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
 - Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
 - Coordinate with PMU Environment specialist to conduct site visits.
 - Impart trainings as per schedule.
 - Prepare monthly environmental monitoring report
220. Environment inspector responsibilities will include;
- Conduct day to day Site inspection activities for any non-compliance
 - Conduct environmental monitoring activities through certified environmental laboratory.
221. ADB's responsibility will be to review IEEs as a basis for the approval of the subproject.

3. Monitoring and Reporting

222. Following section describes monitoring and reporting frequencies and responsibilities;

a) Implementing Agency

- The IA's Environmental Safeguards Unit will prepare a compliance monitoring checklist, based on the EMP and brief Environment Engineer of the Contractor on its use and implementation schedule. The checklist will be completed monthly.
- Carry out field visits for HSE compliance monitoring on quarterly basis

- The Implementing agency will use the compliance checklist reports, plus a semi-annual audit of the work as the bulk of the content of the semi-annual construction monitoring report to ADB..

b) Project Management Consultants

- Ensure the compliance monitoring is being carried out monthly, quarterly and semi annually during the construction period.
- If non compliance is recorded, conduct review meetings with Contractor to address the non-compliance.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, defining what mitigative actions have been undertaken and where this work was done.
- Conduct the Environmental Monitoring (Air, Drinking water Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in the EMP.

IX. CONCLUSIONS AND RECOMMENDATIONS

A. Principal Findings

223. This IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services department. This IEE is in respect of the Sanghar to Mirpurkhas road.
224. The proposed rehabilitation/reconstruction of the Sanghar to Mirpurkhas road will have very little environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites or on fauna or flora. The environmental category is 'B'. There is a minimal requirement for resettlement of illegal encroachers; this is being addressed in a separate LARP.
225. The following are the main issues identified and concerns raised during the study:
- The project road is in bad condition and travel time is around double of what one would be expected for a road in good condition;
 - The road embankment is eroded in some places;
 - There are mosques, graveyards and shrines built adjacent to the ROW of the project road but no cultural or sensitive structure will be affected.;
 - There are major and minor canals and waterways crossing the road, requiring special care during construction works
 - There is only one designated forest in District Sanghar, Khipro Forest. This is far from the project road and will be unaffected.

B. Conclusion

226. The improvement of the Sanghar to Mirpurkhas road, part of the Provincial Road Improvement Project of the Government of Sindh, is limited to road reconstruction within the existing right of way. It is therefore likely to have only limited impact of a temporary nature and short duration. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
227. Provided the EMP is followed, there should be no damage to cultural and archaeological sites. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by concerned agencies, including Contractor, Environment Specialist ES (PMC) and PMU-W&S Department. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.
228. This IEE study concludes that the proposed pilot road project will not lead to significant adverse environmental and social impacts of such nature or magnitude that would require a more detailed report in the form of an EIA. Additionally careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.
229. The project has been discussed with local people, government officials and NGO. The consultations elicited general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked.

The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust. There was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

230. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.

231. The following recommendations are carried over from the text:

- Environmental monitoring shall be carried out by the IA and contractor in compliance with the EMP to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
- The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
- Trees located on the embankments will not be disturbed.
- Asphalt plant shall be located at least two kilometres from settlements
- Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
- Excavation of earth fill will be limited to an appropriate depth of 20cm.
- Canals and other water resources will be closely monitored to ensure no contamination occurs due to project related activities
- A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
- Health and safety plans will be prepared.
- Construction work shall not hinder local people's access to nearby facilities.
- SSEMP will be developed by the contractor which needs to be reviewed by the PMC, approved by IA and final approval is required from ADB. Contractor will not be able to start the construction till the SSEMP is not approved.
- An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
- A grievance redress mechanism will be implemented by the contractor to ensure that community complains are addressed and recorded.

Annex 1

Table 13 Environmental Management Plan: Environmental Mitigation Table (EmiT) and Environmental Monitoring Table (EmoT)

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for Sanghar-Mirpukhas Road.	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	No cultural or archaeological sites have been identified in the Sanghar to Mirpurkhas road and thus no mitigation measures are required.	----	---	----	-----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	NA	WSD	Supervision Consultant
1.8. Contractor's Environmental	Unfortunately contractors have a very poor record with complying with	Plan to be provided the	WSD	WSD	Supervision

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
Safeguards Capacity	workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Consulting Engineer and PMU prior to start of work			Consultant
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be minimised by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, iv. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent 	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	excessive TPM pollution.				
2.5 Disposal of Spoil and Solid Waste					
i. asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
ii. Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	ii The contractor will identify dumping locations for construction debris and non-hazardous solid waste with respective TMA Sanghar, Mirpurkhas, and EPA Mirpurkhas. iii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractors under section 13 of the Sindh Environment Protection Act 2014. iv The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise & Vibration					
i. Noise and Vibrations associated with earthworks and haul	i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust	During Construction	Construction areas	Contractor EHS	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
roads.	<ul style="list-style-type: none"> settling at least on road for 500m on either side of a village. ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800. iii Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities. 	period		Inspector	
ii. Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor EHS Inspector	Supervising Consultant
2.7 Quarry/Borrow Materials					
i. Overloading of trucks, may damage pavement, bridges, and culverts	i. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Throughout construction period	Construction sites	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor EHS Inspector	Supervising Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			
2.8 Contamination of Water Resources (Surface& Ground)					
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>				
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Before the start of construction work.</p> <p>Design phase.</p>	Where utilities services located	Contractor EHS Inspector	Supervising Consultant
2.10 Traffic Disturbance					
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.11 Health and Safety Concerns					
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with masks of a micron size, capable of capturing dust down to 2 microns.</p> <p>iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment.</p> <p>v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD &STI).</p>	Construction period	Construction Camps, Construction sites and Asphalt Plant area	Contractor EHS Officer	IA
2.12 Interruption /Contamination of Water channels					
	<p>i. Contractor should provide the adequate sized diversion, so that there shall be no</p>	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>disturbance to water flows of canal /water course.</p> <p>i. Protection mechanisim should be provided to avoid contamination.</p> <p>iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>				
2.13 Over Used Local Resources					
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
2.14 Contractor Good Housekeeping Practices not Applied					
	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection</p>	Throughout the construction period	All construction camps , work areas and contractor	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>iii. program must be established Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>		'yards'		
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD & Contractor	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	IA
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed	Operation period	As per design	Contractor and Traffic	ES/PMU /IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	limits shall be monitored by the traffic police to avoid any accident and subsequent spillage. An emergency service may be provided by the local authorities.			police	

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP	Before the tendering and before contract finalized	Date and time that confirmation completed filed with PMU	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Monitor to obtain copy of plan and record compliance—for presentation in smi-annual audit report	Prior to start of construction	Date and time that confirmation completed recorded & filed with PMU	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and and compensation of losses Land owners will be compensated This will be monitored through ES- PMU</p>	Monitor checks that topsoil management steps prepared and ready for implementation	During Planning phase, in parallel with the preparation of bid documents	Copy of topsoil protection actions	PMU	Supervision Consultant
1.5. Disturbance to and Archaeological Cultural Sites	There are no cultural or archaeological sites found in the Sanghar to Mirpurkhas road and thus no mitigation measures are required.	----	---	----	----	----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report	Prior to contractor mobilization	Written and dated note indicating compliance & inspection	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	The work along this road will affect the access from a business and residence to the road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the	Review of plan and confirm a) consultation action proposed b) inclusion of timetable and c) inclusion of clean	Completed prior to contractor mobilization and provided the contractor as part of the contract	Written and dated note indicating compliance	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access	up and reconnection action.	documentation			
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<p>i. The Contractor will be required spray water on unsealed roads and work areas daily, within villages and past houses located close to the road and giving priority to sealing in urban areas.</p> <p>ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas.</p>	Travel work areas and check for dust—and if found take immediate action with contractor	Anywhere where there is material moved, earthworks cutting and filling.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system.	Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	i. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted	action with contractor. Inspect batching plant dust suppression mechanism, its maintenance log book.		action taken		
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	<ul style="list-style-type: none"> i. Check query sites for depth. ii. Ensure contractor store topsoil properly, and restore query site as much as possible at end of work. iii. Ensure Land owner get adequate compensation 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken	WSD	Supervision Consultant
2.4 Increase in air pollution from vehicular and machinery exhaust	Emissions will be kept to a minimum by: <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly 	Record findings and conduct regular inspections in association with	Throughout the construction period	Inspection note to file for use in contractor reporting and	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<ul style="list-style-type: none"> ii. maintained according to manufacturer's specifications; ii. use appropriate octane fuel and haul loads within specified limits. ii. Vehicle idling time limits to no more than 2 minutes and v. Equipment maintenance specifications will be imposed through construction inspection and regular reporting. v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	construction supervision		in semi-annual audit report		
2.5 Disposal of Spoil and Solid Waste						
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps.	<ul style="list-style-type: none"> i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective TMA Sanghar, Mirpurkhas, and EPA Mirpurkhas. i. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under 	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>					
2.6 Noise & Vibration						
i. Noise and Vibrations associated with earthworks and haul roads.	<p>i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village, Same approach is to be taken if the other site is used.</p> <p>ii. Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800.</p> <p>iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.</p>	Using a portable noise meter, monitor checks conditions , and inspects if work conducted within permitted time period on urban zones	Throughout construction period	Inspection note, signed and dated	PMU	Supervision Consultant
ii. Excessive Noise at sensitive sites, identified in IEE, i.e. schools, residential areas, mosques, health care centers	iv. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Noise measurements at these sites recorded by monitor and if exceeding, immediate action to erect temporary barriers	Throughout the construction period	Inspection note with noise reading results	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Overloading of trucks, damaging pavement, bridges, culverts etc	i. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials	Throughout construction period.	Inspection note re findings, dated and signed		
2.8 Contamination of Water Resources (Surface& Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected. ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and	Regular inspection of work camps, contractors yard, fueling areas , fuel storage	At least monthly throughout the construction period.	Checklist showing check fuel and lubricant handling, waste oil management , machinery	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing.</p> <p>iv. All diversions must be checked for Signages and lightings on weekly basis,</p>	Regular monitoring of diversion for signages and lightings	At least fortnightly where diversions are placed	<p>was down water control, etc. signed and dated--filed.</p> <p>Checklist showing the check for lighting and signages signed and date filled</p>		
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	Review of notifications and approvals from all utilities as per the legal requirements	<p>Before the start of construction work.</p> <p>Design phase.</p>	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.10 Traffic Disturbance						
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project	Inspect construction areas where access is an issue	Throughout construction period	Inspection note re findings, dated and	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	and establish if contractor is managing problem and if local residents are satisfied		signed		
2.11 Health and Safety Concerns						
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. ii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment.</p> <p>iii. All Construction labour and staff of the contractor and consultant will briefed in STD's and given option to be tested (personal choice).</p>	Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.12 Intruption /Contamination of Water channels						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<ul style="list-style-type: none"> i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanism should be provided to avoid contamination. iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents. iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed 	<p>Inspection of diversion along the road, check signages, lighting any leakage etc at the diversion and rectify through contractor.</p> <p>Ensure contractor has adequately restored temporary land.</p>	Culverts and bridges	Contractor EHS Officer	IA /PMU	Supervision Consultant
2.13 Over Used Local Resources						
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern	Throughout construction period—at least once when work is near or in a community	Meeting note signed and dated	PMU	Supervision Consultant
2.14 Contractor Good Housekeeping Practices not Applied	<ul style="list-style-type: none"> i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established iii. Monitoring will be required for the solid waste disposal at camp site 	Inspect all camp operations including worker housing and all waste management procedures	Throughout the construction period while work camps are in operation	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>					
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released	Obtain completion report and review for compliance	1 month before the end of the construction period	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	WSD	WSD
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

Initial Environmental Examination

P46377-PAK
TA 8406-PAK
July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Tando Muhammad Khan to Badin Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

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Initial Environmental Examination

April 2015

TA 8406-PAK: Provincial Road Improvement Program:

Rehabilitation of the Project Road No. 5

Tando Muhammad Khan to Badin Road

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
Cm		Centimetre (1/100 metre)
cm ³		Cubic centimetre
CO	mg/m ³	Carbon monoxide
dBA		A measure of audible (the ear) noise
DBH		Diameter Breast Height
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMC		
EMiT		Environmental Mitigation Table
EMoT		Environmental Monitoring Table
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
GFP		Grievance Focal Person
GRM		Grievance Redress Mechanism
IA		Implementing Agency
IEE		Initial Environmental Examination
km/h		Kilometres per hour
LARP		Land Acquisition and Resettlement Plan
M		metre
Masl		metres above sea level
Mg		Milligram (1/1000 grams)
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PD		Project Director
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
Rs		Pakistan Rupees
S-EPA		Sindh Environment Protection Agency
SPEQS		Sindh Provincial Env. Qual. Standards
SO ₂		Sulphur dioxide
TMK		Tando Muhammad Khan
TPM	ug/m ³	Total Suspended particulate matter, with particles ≥ 10 microns in size,

and a danger to lungs. Also referred to as PM₁₀

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 5, the 67 km Tando Muhammad Khan – Badin Road which links the N5 at Khyber with the district administrative centre of Sanghar. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WSD and any contractors on the EMP and

the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

No mosques, graveyards and other cultural sites are within or near this roadway and therefore no such features will be impacted. Only three trees need to be cut, while trees on the embankments will not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

The contractor will be required to prepare a Site Specific EMP (SSEMP), including a number of subplans addressing, traffic management, sewage, garbage and oil waste management and borrow site operation and demobilization of owned/operated by the contractor.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are

minor and able to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP during all three project phases is estimated at Rs 28,403,148 including a 10% contingency.

I. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing new asphaltic concrete base and riding surface. Other sections will be rehabilitated, involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated ([Table 1](#)) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as Figure 1.

Table 1 List of Selected Roads

No.	Road sections	Km
1	Kandhkot – Jacobabad	77
2	Jacobabad – Ratodero	55
3	Khyber – Sanghar	64
4	Sanghar – Mirpur Khas	64
5	Tando Muhammad Khan – Badin	67
6	Mirwah – Naukot	64
	Total	391

4. A separate IEE has been prepared for each road. This IEE has been prepared for road No.5, a 67 km long from Tando Muhammad Khan to Badin highway.

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner.

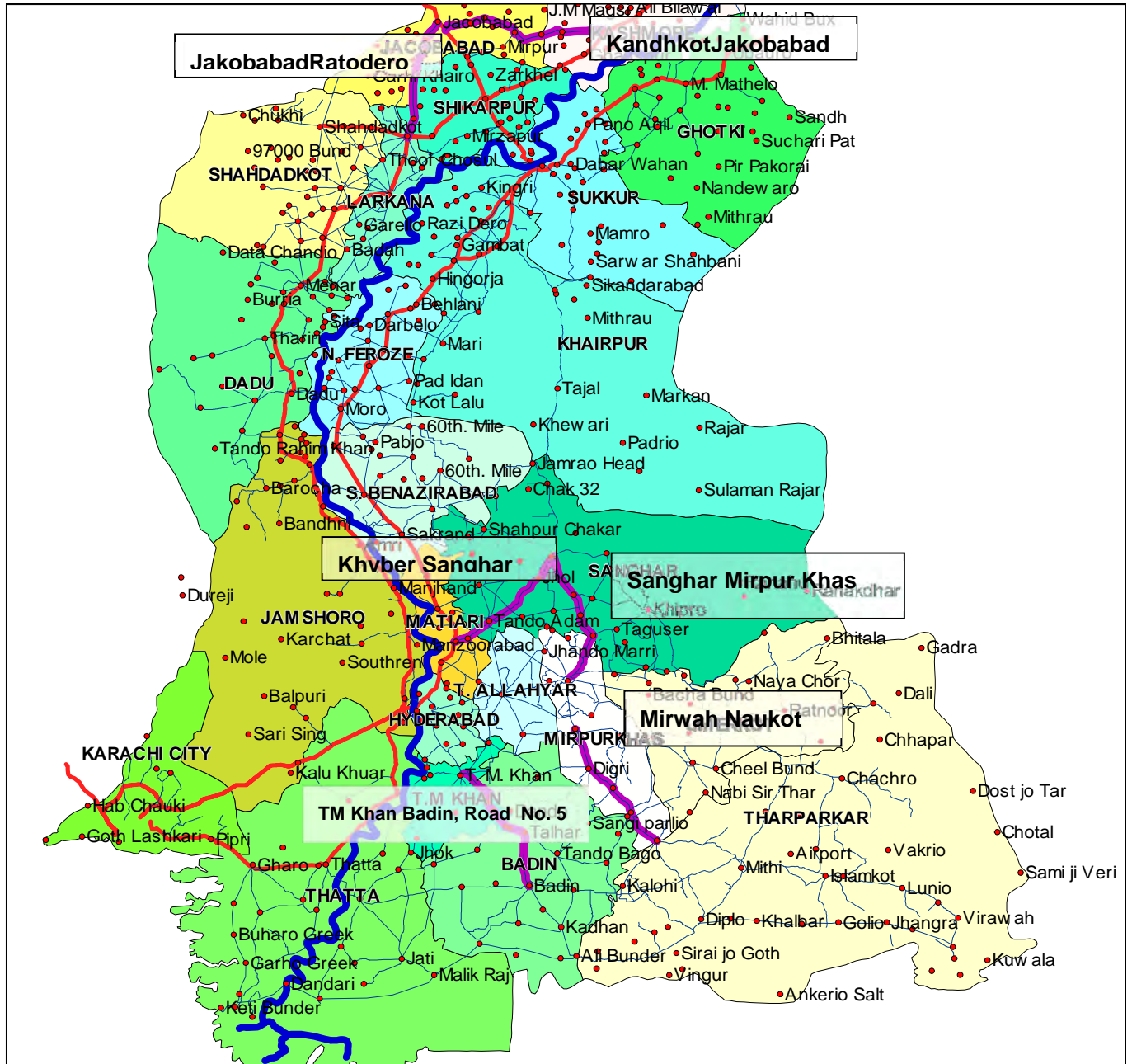


Figure 1 Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan (LARP) report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (SEPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who are required to ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there would be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road's physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project's corridor of impact, generally considered to extend 15m in both directions from the carriageway centreline, was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.
13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Relevant data were surveyed along with previous IEE/EIA studies conducted in the region. Legislative requirements and regulatory requirements pertaining to the project were also reviewed. Documents reviewed included:
- Power Distribution Enhancement Investment Program – Tranche –III Assisted by ADB MFF 0021- Pak; Initial Environmental Examination Report for The Construction of 132 KV New Matli Grid Station and Tando Muhammad Khan - 132 KV New Matli Double Circuit Transmission Line, October 2012.
 - ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-Pak, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
 - National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
 - Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
 - Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.
 - Sindh Water Sector Improvement Program; Environmental Impact Assessment for works on Khipro and Mithrao Canal; A project of Sindh Irrigation and Drainage Authority; Pakistan; Volume; 1 September 2012
15. In addition, the following web sites were accessed relevant information extracted and included in this report. These sites are:
- <http://www.meoweather.com> date visited: September 2014
 - www.pbs.gov.pk date visited: September 2014
 - <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure and action to either prevent or minimize negative effects was identified and a monitoring requirement specified. These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.
18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter VII and Annex 1).

II. PROJECT DESCRIPTION

A. Project Description

19. The project is to reconstruct the provincial highway S77 (Hyderabad to Badin) between the district centre of Tando Muhammad Khan and the district centre of Badin. The road passes two provincial towns, Matli, and Talhar. When reconstruction is complete, the road will improve the linkage between Badin and Tando Muhammad Khan, Hyderabad, Karachi and North Sindh (Figure 1).

B. Existing Condition of Project Road

20. The road surface is mostly in good condition, but needs strengthening to cope with expected loads. An estimated 17 km near the southern end has failed and requires urgent renewal.

21. A typical cross section is shown as **Error! Reference source not found..**

C. Re-Construction & Rehabilitation to be Undertaken

1. Scope of Work

22. The project design has allowed for the entire length of the Tando Muhammad Khan to Badin road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer , and will depend on the exact condition of the base material. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides a full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations measures

23. The proposed activities will be confined to the existing road right-of-way (RoW). extending some 15 meters on either side of the road centreline..

2. Reconstruction of existing carriageway

24. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.

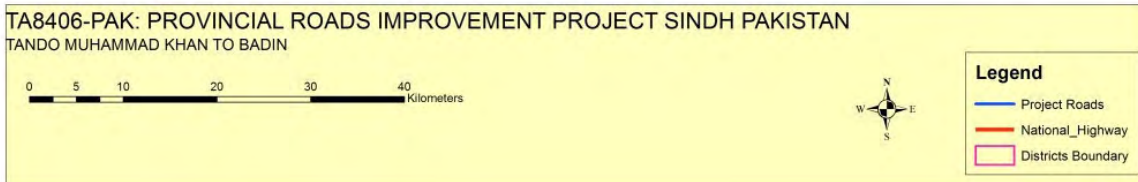
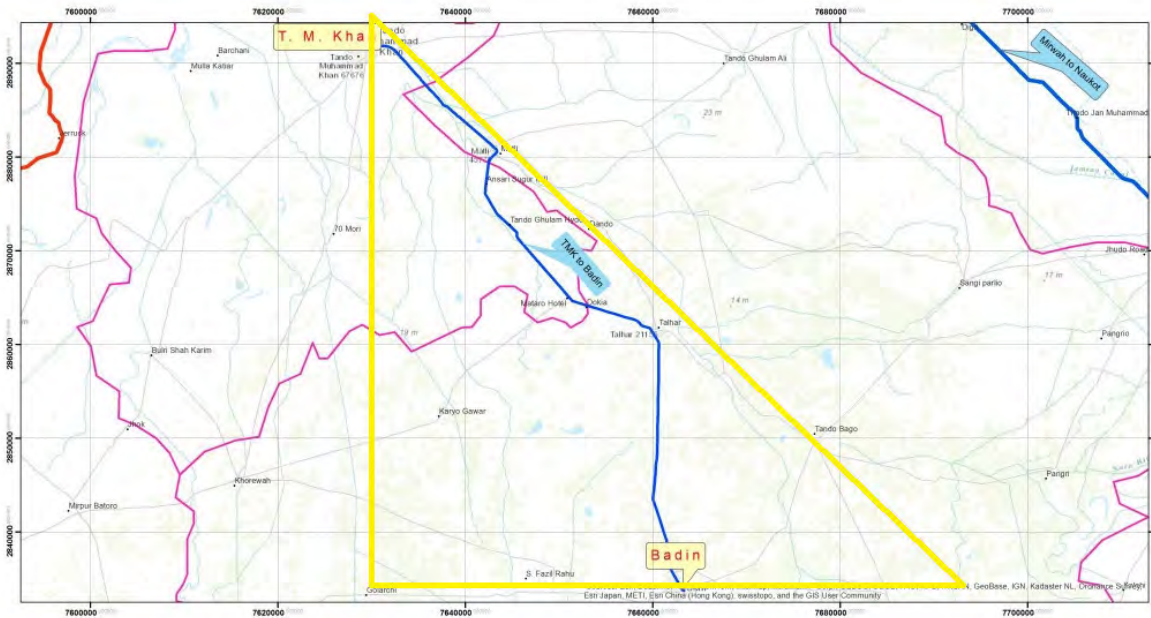


Figure 2 Tando Muhammad Khan to Badin Road

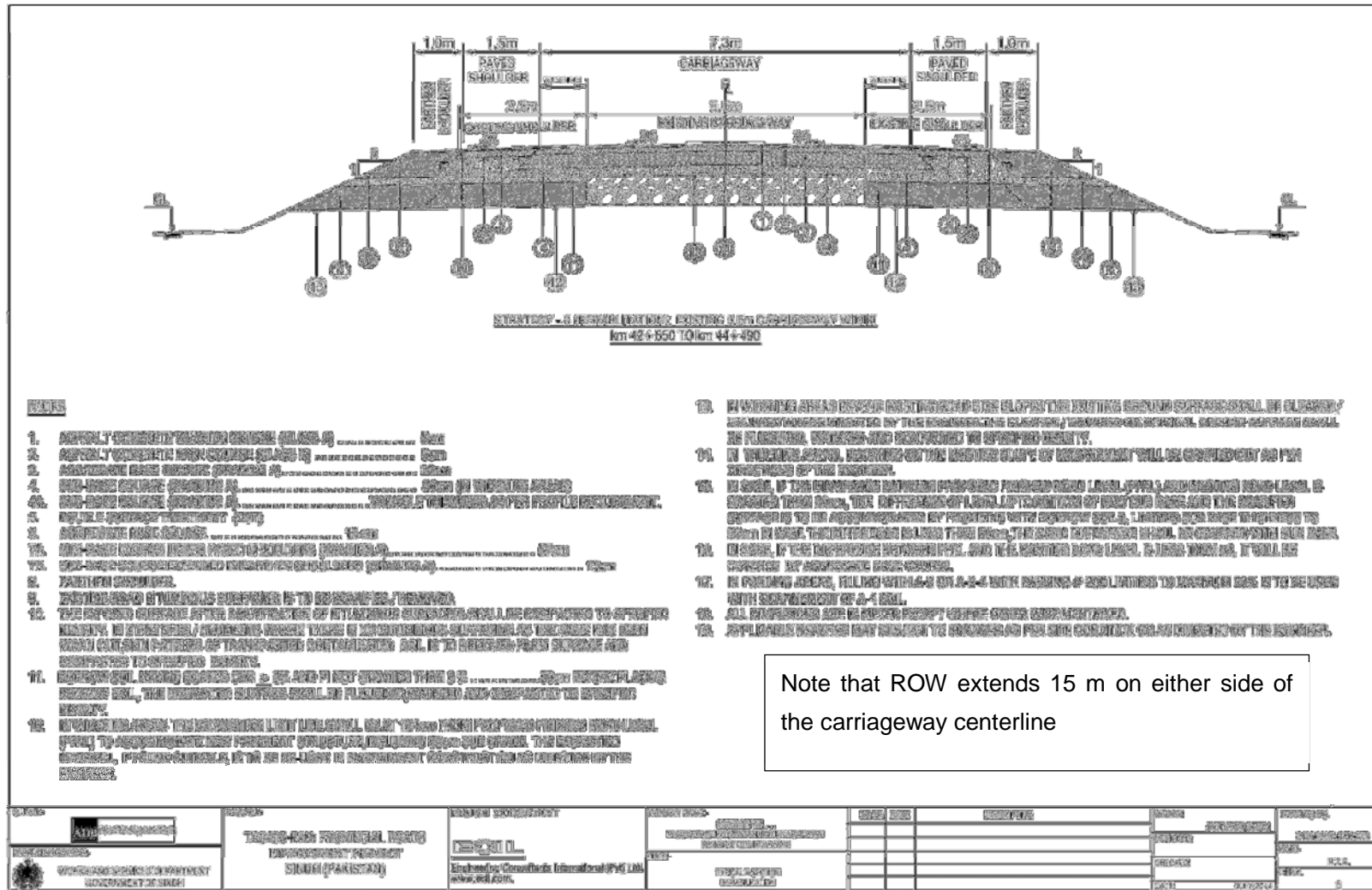


Figure 3 Typical Cross section showing Existing Road

25. The main steps involved in reconstructing a section of road are:

- i. Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- ii. Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- iii. Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- iv. Use recycled or new crushed aggregate to provide a compacted 30cm aggregate base course over the width of the pavement
- v. Lay a 90 mm asphaltic concrete base course (may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

3. Rehabilitation (Overlay)

26. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses. The key steps are:

- i. Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- ii. Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- iii. Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- iv. Roughen and or apply a bitumen tack coat to the existing bituminous surface. Material removed is to be transported to an approved disposal site.
- v. Lay a 90 mm asphaltic concrete base course (may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

4. Reconstruction and Rehabilitation of Culverts

27. Many of the culverts are blocked, damaged or are inadequate for expected requirements. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Reopening of the road will follow the relevant steps outlined in Section 2 above. It may also be necessary to provide temporary diversion for the water channel around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

a. Repair and rehabilitation

28. If the existing culvert can be repaired, the main steps are:

- i. Remove vegetation from culvert inlet and outlet up to 15 ft, from either side.
- ii. Where Culverts needs extension, provide a sand cushion of about 1 ft. (300 mm) in thickness and place lean concrete as a base for the new culvert extension.
- iii. In the culvert's base slab all pitting shall be rectified by providing bonding agent and a steel reinforced concrete cover of 3" in thickness.. Anchor bars shall be drilled into the base slab.
- iv. The masonry side walls shall be deep pointed. Masonry that has deteriorated will be replaced with good quality bricks and mortar.
- v. The top slab shall be examined for cracks, which shall be repaired with epoxy injection. If steel reinforcing is exposed and rusted, it shall be removed and replaced. The concrete shall be chipped, a bonding agent applied and concrete shall be applied in the form of plaster. Steel rods shall be drilled into the old concrete at 18" centres and grouted.
- vi. After rectification work is carried out all the areas shall be coated with Brushcrete Compound (an acrylic waterproofing compound).
- vii. Restore roadway and shoulders

b. Replacement or new culverts

29. If an existing culvert requires replacement, old material will need to be cleared and either used as fill (as sub base, or to restore used borrow pits for example) or disposed of at an approved disposal site.

- i. Preparation of the site as for repair and extension
- ii. New RCC slab culverts will have a reinforced concrete slab base with steel anchor bars, masonry walls and reinforced concrete slab top.
- iii. Restoration of the carriageway.

c. Rectification of Bridges

30. One bridge, located at chainage (41+535) requires repair; while the bridge at chainage (34+425) needs to be replaced. Temporary diversion of traffic may be required. The following are the main steps that will be involved.
- i. Cleaning of all concrete surfaces including girders and transoms.
 - ii. Providing plaster to guardrails and posts including curbs wherever necessary.
 - iii. Cleaning expansion joints.
 - iv. Repairing training works (where necessary). This involves placing rocks and boulders in the water course either separately or inside wire casings.
 - v. New deck construction (as & where required depending upon the deteriorated condition of deck slab). This involves the removal and disposal of the damaged material and construction and placement of a reinforced concrete slab,

D. Construction Materials

31. Construction materials require transportation from the source to the work site as follows.
32. **Stone-** Stone for base course is available in abundance at Kotri quarry which lies at a distance of 25 Km from Hyderabad towards Karachi. This quarry is very large and meets the requirement of all the Sindh Province. The availability of stone for base course can be supplemented from Ganja quarry which is at a distance of 15 Km South of Hyderabad opposite Airport
33. **Bitumen-**The National Refinery Karachi (200 km from Tando Muhammad) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source.
34. **Cement** - There are quite a few cement factories in the vicinity of project road, namely Zeal Pak Cement Factory in Hyderabad (30 km from Tando Muhammad), Lucky Cement Limited and Power Cement Factory in Nooriabad (120 km from Tando Muhammad Khan).
35. **Sand-**Good quality of sand is available at Bollori which is 15 Km beyond Kotri quarry as well as from Jamshoro which is in the vicinity of Hyderabad (50 km from Tando Muhammad Khan) There are other quarry sites available in the sub-project area which can be utilized. These are all within 70 km of where road maintenance and rehabilitation will take place.
36. **Steel Reinforcement (Rebar)-**The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:
- Mehran Mills
 - Islam Mills

- Hyderabad Mills
37. The distance from Hyderabad mills to Tando Muhammad Khan, the project start location, is about 34kilometres.
38. **Aggregate and Concrete-** Crushed stone aggregate for concrete is available in Nooriabad, Jamshoro, (Petaro) all between 20-80 kilometres range at Nooriabad and Jamshoro.
- Crushed Aggregate for Asphalt Concrete Petaro Quarry
 - Sub Base (Muram) Kotri Quarry
 - Aggregate Base Course Petaro Quarry
 - River Sand From Indus River Basin
39. **Bricks-** The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.
40. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation & Drainage Authority. While the amount of water required is considerable, it is should be negligible when compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 12 to 14 meters.
41. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.
- Option 1:** Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.
 - Option 2:** Waste material can be used to refill borrow pits and covered with topsoil¹
 - Option 3:** Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.
42. The total quantity of material to be disposed of is estimated to be 35,476.00 m³.

¹A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, borrow area fill or for secondary road repair.etc.

III. DESCRIPTION OF THE ENVIRONMENT

43. The description of the environment of the project roads requires baseline data on the following:

- Physical Environment
- Ecological Resources
- Socioeconomic Environment

A. Physical Environment

1. Topography

44. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South.

45. The Tando Muhammad Khan-Badin road lies in the central alluvial plain.

2. Soils

46. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in the Nara and Jamrao Canal command area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.

47. The alluvial deposits date back to the time when Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

48. The seasons in Pakistan can be best classified as

- Winter, from December to March
- Pre-monsoon (summer), from April to Monsoon, from June to September
- Monsoon, from June to September
- Post-monsoon, from October to November
- Summer season runs from April until October and winter runs from November to March.

²http://en.wikipedia.org/wiki/Samma_Dynasty site visited on 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on 18.01.2015

49. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, and as such it escapes the influence of both, resulting in a rainfall of only 15 to 18 cm per year.

50. For the Tando Muhammad Khan-Badin road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in [Table 2](#).

Table 2 Average Air Temperature and Precipitation in Tando Muhammad Khan and Badin³

Month	Tando Muhammad Khan			Badin		Precipitation (mm)
	Temperature °C		Precipitation (mm)	Temperature °C		
	Maximum	Minimum		Maximum	Minimum	
January	23.8	11.8	14.3	25.78	8.73	0.96
February	27.8	14.7	5.6	28.59	11.60	3.60
March	33.3	18.7	6.9	34.02	16.80	2.30
April	38.2	23	5.5	38.40	21.80	2.49
May	40.6	26.1	4.8	39.85	25.47	0.69
June	39.5	27.9	12.1	38.02	27.46	10.76
July	36.7	27.3	20.7	35.1	27.04	70.49
August	35.4	26.3	50.4	33.61	26.06	89.88
September	36.1	25.2	13.4	34.36	24.87	34.43
October	35.8	22.8	3	35.80	21.70	3.72
November	31.1	18.5	0.1	31.87	15.86	1.67
December	25.5	13.8	15.6	26.68	10.10	1.11

4. Air Quality and Noise

51. The Tando Muhammad Khan-Badin road is located in a rural area and human activity is primarily related to agriculture, although there are some sugar mills / industries also. The major air quality issue is total suspended particulate matter (TPS) and NO₂. The TPS level can exceed acceptable levels due to the presence heavy dust. Human activity such as from sugar mills and cultivation of the fields aggravates the situation. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.

52. Since WSD has not yet established its own environmental monitoring capacity, there are no comprehensive air quality and traffic noise monitoring data available. However data

³<http://www.meoweather.com> site visited September 2014

are available from studies relating to the construction of the new 132 KV Matli Grid Station and the new Double Circuit Transmission Line. The sampling points for these studies are located along the subproject road. (Table 3).

Table 3 Ambient Air Quality at One Station– Tando Muhammad Khan-Matli Road ⁴

Parameter	Units	Sampling location Matli	NEQS 2013 24h Avg.
Total suspended particulates	mg/m ³	1.09	0.50
Oxides of sulfur (SOx)	mg/m ³	0.0685	0.120
Oxides of nitrogen	mg/m ³	0.0480	0.040
Carbon dioxide	mg/m ³	0.782	5.00

Note:

53. Existing traffic volume is relatively low (Table 7) and the adjacent land use is primarily agricultural. Both road and other ambient noise levels increase when the road enters a town. Existing noise levels (Table 4) were recorded from previous studies and reflect the expected low noise conditions. The noise levels were within the acceptable limits of commercial area NEQS /GoP Standard in day time and acceptable range for transport corridors as defined in Pakistan.

Table 4: Noise intensity in medium-sized towns⁵

Location	Noise intensity dBA			NEQS /GoP Standards: 2012 (Commercial Zone/Residential Zone)	
	High	Medium	Low	Day	Night
TM Khan-Matli road	63.14	46.21	34.35	65/55	55/45

5. Hydrology

54. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies

⁴ IEE for construction of 132KV grid new Matli Grid Station and Tando Muhammad Khan -132 KV New Matli Double Circuit Transmission Line and units converted from ug/m³ and ppm to mg/Nm³

⁵IEE for Construction of 132 KV New Matli Grid Station and Tando Muhammad Khan – 132 KV New Matli

from 3 meters to 25 meters along the route. Tando Muhammad Khan district is irrigated by the canals from the Sukkur and Kotri barrage and by rain water. However, other modes of land irrigation such as river water and tube wells are also used. The area being fed by Kotri is further divided in perennial and non-perennial system of irrigation. The irrigation network is mainly comprises Guni Canal, Akram wah and Nasir canal . There are two major canals, three minor canals and thirty six water courses crossed by the Tando Muhammad Khan- Badin Road. These water sources are the major source of drinking water as well as water for irrigation. [Table 5](#) show the list of water sources crossing Tando Muhammad Khan to Badin road with their chainage.

Table 5 Location and Type of Water Courses Crossed by Tando Muhammad Khan to Badin Road

Canal	Watercourse	Minor	Chainage (m) : 0.00=TMK Town
	1		1500.000-1600.000
	1		1900.000-2000.000
	1		2600.000-2700.000
	1		3600.000-3700.000
		1	3900.000-4000.000
1			6800.000-6900.000
	1		7900.000-8000.000
	1		10000.000-10100.000
	1		10100.000-10200.000
	1		10800.000-10900.000
		1	12800.000-12900.000
	1		14000.000-14100.000
	1		18900.000-19000.000
	1		19000.000-19100.000
	1		19350.000-19450.000
	1		20600.000-20700.000
	1		23400.000-23500.000
	1		25500.000-25600.000
		1	27050.000-27150.000
	1		28900.000-29000.000
1			30200.000-30300.000

Canal	Watercourse	Minor	Chainage (m) : 0.00=TMK Town
	1		42100.000-42200.000
	1		45750.000-45850.000
	1		48600.000-48700.000
	1		49100.000-49200.000
	1		50000.000-50100.000
	1		52300.000-52400.000
	1		52900.000-53000.000
	1		53600.000-53700.000
	1		53800.000-53900.000
	1		55700.000-55800.000
	1		59900.000-60000.000
	1		60500.000-60600.000
	1		62400.000-62500.000
	1		62800.000-62900.000
	1		63300.000-63400.000
	1		63700.000-63800.000
	1		64100.000-64200.000
	1		64100.000-64200.000
	1		65300.000-65400.000
	1		66500.000-66600.000
02	36	03	

55. Excessive irrigation and seepage from canals has caused water logging and salinization problems near Badin. Recent floods have exacerbated this problem, since farmers have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface

6. Seismicity

56. According to the seismic zone map of Pakistan, the Project Area lies in a zone where minor to moderate damage can occur ([Figure 4](#))

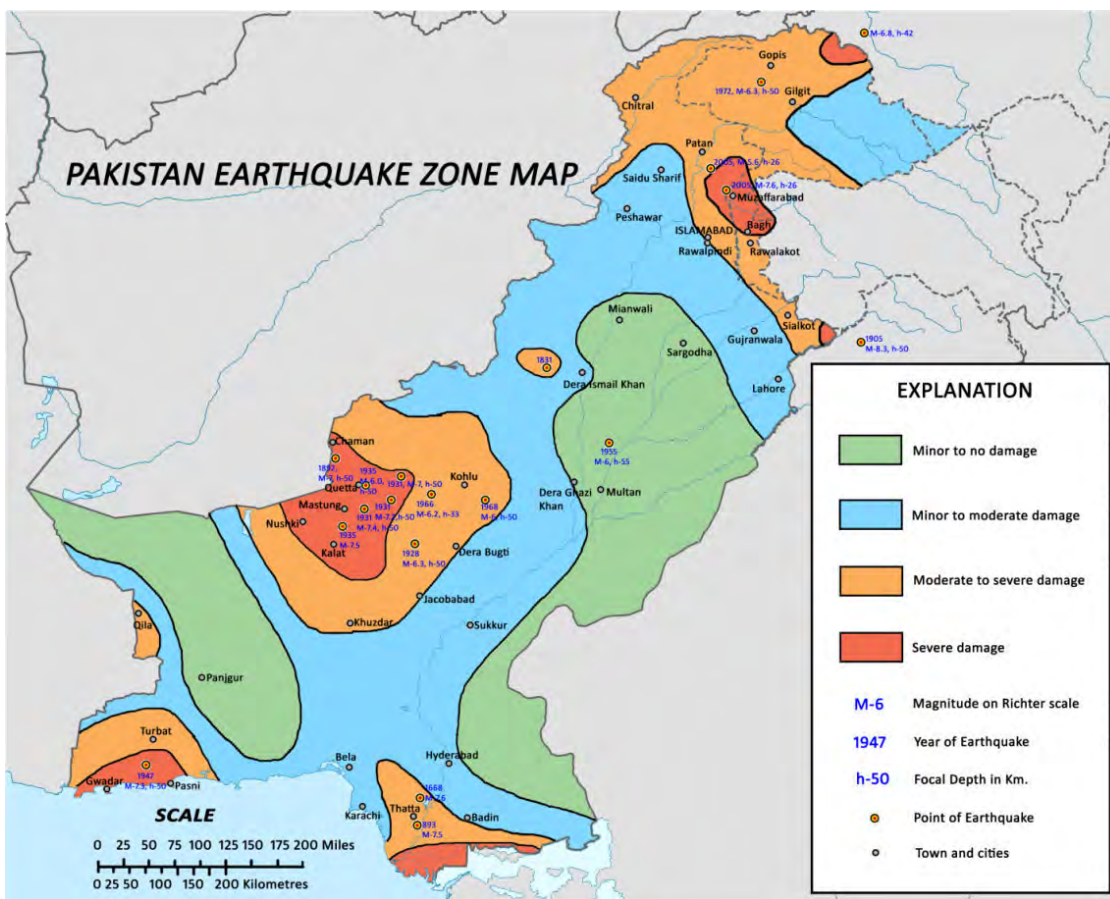


Figure 4 Pakistan Earth Quake Zones

7. Archaeological and Cultural Resources

57. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.

58. Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Fourteen Mosques, three Graveyards and two Shrines were identified as being potentially affected by the proposed work on the Tando Muhammad Khan to Badin road. A detailed inventory of the sites showing the approximate location of the structures is provided in [Table 6](#). By applying careful highway design all potential impacts were avoided. However care will need to be taken during construction activity.

Table 6 List of Archaeological and Cultural Resources impinging to the ROW

0-10 km			11-20			21-30			31-40			41-50			51-60			61-70		
M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G
1	0	0	4	0	1	3	0	0	2	0	0	2	1	0	1	1	1	1	0	0
Mosque (M) =14 , Shrines (S)= 2 and Graveyards (G)= 3																				

B. Ecological Resources

59. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

60. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.

61. The dominant trees in lower Sindh are babul (*Populus euphratica*), ber (*Zizyphus numularia*) and several varieties of Tamarix such as *Tamarix gallica* and *Tamarix diocia*, talhi (*Dalbergia sisoo*), kri (*Tamarix gallica*), karir (*Coparrisa phylla*).

62. Of more concern would be damage to old plantations of *Azadirachta indica* (Neem), *Albizia lebbek* (Shrin), *Ficus religiosa* (Peepal), *Acacia nilotica* (Babul), *Cordia myxa* (Lasura) and *Ficus benghalensis* (Borh), and recent plantation of *Cornucopias*. These trees have significant medicinal value or are important culturally.

63. Among the grasses; *Lymb (Arislida depressa)*, *Chemmer (Eleusine compressa)*, *Gorkha (Lasiurus indicus)* and *Kana (Saccharum bengalensis)* are found in the Project Area. *Koondor Dib (Typha augustata)* is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

64. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.

65. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

66. Reptiles include snakes such as cobra (*Naja naja*), rattlesnakes (*Crotalus horridus*) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (*Varanus ssp.*), spiny tailed lizard (*Uromatix hardwickii*) and fringed toed lizard (*Acanthodactylus contouris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

67. Important bird species found in the project area are the common crow (*Corvusbrachyrhynchos*), common mynah (*Acridotherestrictis*), house sparrow (*Passer domesticus*) and common teal (*Anascrecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdixperdix* and *Melanoperdixniger*), though present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coraciasbenghalensis*), crested lark (*Galeridacristata*), vultures (several varieties) and quail. White heron (*Ardeaalba*) and black heron (*Egrettaardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconiaciconia*), white pelican (*Pelecanusonocrotalus*), little brown dove (*Spilopeliasenegalensis*) and white throated king fisher(*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

68. Ecosystems include protected areas such as wildlife sanctuaries, national parks and game reserves. Six wetlands which are found in the District Badin of the sub-project but none near or within RoW of the Tando Muhammad Khan Badin Road.

69. There are six wetlands located in the Badin District, but there is no wildlife sanctuary or game reserve located in the project district. The nearest wild life sanctuaries area is the Rann of Kutch some at 140 Kilometres to the north-east and Nara Desert some 130 kilometres south-east of the road corridor.

70. The nearest wetland is Nurri Lagoon, which is very shallow brackish lagoon with barren mudflats on the northern side. The site has consistently recorded very large concentrations of migratory water birds on a seasonal basis. Salinity and sedimentation are increasing due to the intrusion of the sea in this area. The privately-owned land provides livelihood to about 3,000-4,000 people in surrounding villages, chiefly through fisheries. Invasive species, such as Typha and occasionally Tamarix, are seen to be hindering the growth and diversity of native flora, and population pressures, including accelerating agricultural and industrial pollution, offer challenges. The Nurri lagoon area is some 40 km to the south west of the road and the reconstruction of the project will have no impact.

F. Socio-Economic Environment

1. Road Transport

71. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. There data

show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in [Table 7](#)

Table 7 Twenty four hour Traffic count for the Hyderabad –Badin Road

Location	Motorcycle	Car/ 4wd	Rick shaw	Vans/ PU	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
TM Khan - Matli	2290	432	2936	846	359	0	634	70	47	50	15	7680
Matli - Talhar	4324	725	2420	1017	254	10	474	47	44	4	75	9390
Talhar - Badin	5161	948	1604	564	161	11	400	95	18	12	233	9206

72. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons, and therefore met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to include approximately 400 heavy vehicles a day (mainly 2 axle trucks and tractor-trailers); twice the number surveyed in June.

2. Structures Affected

73. During the topographic survey it is revealed that there will be no structures affected, including residential, commercial, religious and cultural sites. This has also been mentioned in LARP recommendation section 2.1 and table 2.1.

3. Drinking Water

74. During the survey it was learned that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location; with areas close to irrigational canals having comparatively better quality water while water in more distant locations is saline.

4. Industrial and Commercial Activities

75. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, cotton ginning and flour mills. There are also some brick kilns

5. Employment and Income Sources in Project Area

76. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment

during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

77. Agricultural lands are owned by landlords and farmers work for a share of the sale of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves, graze a few cattle and grow vegetables for food.
78. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.
79. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.
80. Agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers, small business, and as labourers in the sugar, cotton and rice industry and 5% have government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.⁶

6. Demography

81. The project road is located in the Tando Muhammad Khan district, and the demography is diverse (Table 8).

Table 8 Demography of the Subproject road Tando Muhammad Khan to Badin⁷

Factor	Tando Muhammad Khan	Badin
Area km ²	1831	6726
Population (Persons)	447,114	1,136,044
Male	232,499(52%)	597,573(52.60%)
Female	214,615(48%)	538,471(47.40%)
Sex ratio (M:F)	110:100	111.100
Population Density	168.9 per km ²	168.9 per km ²
Urban Population	161,902 (27%)	1,864,880(16.25%)

⁶ Project of Sindh irrigation and Drainage Authority EIA report for Works on Khipro and Mithrao Canal; September 2012

⁷ www.pbs.gov.pk, http://dearsir.pk

Factor	Tando Muhammad Khan	Badin
Rural Population	1443,919 (73%)	949,556(83.58%)
Avg Household size	6	5.3
Literacy ratio 10+	36.00%	24.6%
Male	49.00%	35.07%
Female	23.00%	12.09%

82. Tribal people include Halapotra, Hingora, Syed, Almaani, Dars, Jamali, Mahendo, Khoso, Kolhi, Junejo, Leghari, Memon, Malik, Lashari, and Solangi. Sindhi language is commonly spoken in the majority of the communities in the project area. However, Sariaki Balochi,, Urdu, Punjabi and Siraiki languages are also spoken and understood.

7. Archaeological, Cultural and Historical Resources

83. There are no archaeological, cultural or historical resources in this corridor and none will be impacted by any of the work activities.

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design (Pre-Construction) Phase Impacts

1. Lack of Environmental Capacity

a) Description

84. During the field surveys it became clear that the provincial and district government officials who will be charged with overseeing the construction are unfamiliar with the environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented is low.

b) Mitigation Measure

85. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use.

2. Lack of Integration of IEE/EMP Requirements into Construction Bid Documents

a) Description

86. The Bidding documents should reflect the requirement to select a qualified and experienced contractor. Bidding documents should reference or present the methodology on how to apply acceptable environmental and social safeguards at worksites. The bidder's environmental, social and safety methodology shows material deviation, reservation or omission towards environmental, social and safety specification.

b) Mitigation Measures

87. PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP

3. Loss of Vegetation and Trees

a) Description

88. There are various trees located on the both sides of the Tando Muhammad Khan to Badin road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to cut some in order to meet road safety standards. There will be loss of

vegetation in some locations, but always within the road RoW According to the LARP report section 1 Table 1.1 three mature trees will be cut to pave the way for the required width of carriageway

b) Mitigation Measures

89. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every tree more than 10cm Diameter Breast Height (DBH) that is cut down .

4. Erosion

a) Description

90. Any areas where topsoil must be removed will be prone tor rapid erosion due to either the monsoon rains or the dry winds . Topsoil and deeper layers will wash into surface waters or be swept into the air creating dusty conditions, impacting a wide range of community assets.

b) Mitigation Measures

91. Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners

5. Disturbance to Archaeological and Cultural Sites

92. There are no cultural or archaeological sites found in the Tando Muhammad Khan-Badin road and thus no mitigation measures are required.

6. Material Haul Routes

a) Description

93. Hauling of material has significant impacts on the community, public safety, traffic congestion, air quality and lifespan of the town road ways.

b) Mitigation Measures

94. the number of construction vehicles hauling materials along urban roads and anywhere where there are road side residences will be limited and the WSD will establish a route plan to minimize this disruption.

7. Consultation Plan with affected roadside landowners

a) Description

95. The roadside residents and landowner may come across in relation to the road side schedule in installation of new fence, rubbish dumping, weed control and feral animal control which may cause disruption to the road side landowners.

b) Mitigation Measures

96. Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners well in advance of the work taking place define the access restriction and the measures to be taken to allow movement around the construction work.

8. Contractor's Environmental Safeguards Capacity

a) Description

97. The responsibilities of safeguards unit reviews and finalize the document relating to environmental issues. Contractor with less capacity of safeguards do not comply with workplace environmental, social and safety regulations.

b) Mitigation Measures

98. Unfortunately contractors have a very poor record complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

99. A small increase in particulate matter (dust) is expected within the construction airshed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

100. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii) spraying of water on unsealed roads and work areas within villages and past houses located close to the

road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

101. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plants require cement, dry sand and a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust is emitted when bagged cement is loaded manually into the batch plant hopper, as well as from the conveyor system bringing the materials to the plant.

b) Mitigation Measure

102. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or will need to be retrofitted if contractors' existing systems are out of date.

3. Erosion

a) Description

103. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

104. Excavation of earth fill will be limited to $\leq 20\text{cm}$. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated via a written agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

105. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

106. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with 12 months of the start of the work. Secondly no construction vehicles will be left idling for more than 2 minutes.

5. Disposal of Spoil and Solid Waste

a) Description

107. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand and aggregate), empty drums, concrete waste and waste from work camps.

b) Mitigation Measures

108. The asphalt and base course removed from the existing road will be recycled⁸. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then overlain with top soil. Asphalt can be pulverised, spread on access roads and compacted.

109. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective Taluka Municipal Association (TMA) Tando Muhammad Khan, Badin, and Environment Protection Agency.

110. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

6. Noise and Vibration

a) Description

111. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.

112. Vibration will occur during compaction when vibratory rollers are used to compact sub grade materials. This is unlikely to cause permanent damage.

⁸ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. borrow area fill or for secondary material in fields, etc etc.

b) Mitigation Measures

113. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured against the Sindh Provincial and Pakistan National Environmental Quality Standards . Exceedances of these standards will require immediate noise reduction measures such as baffles and barriers

7. Quarry /Borrow Material

a) Description

114. Transport of construction material (aggregate and fill) may raise environmental and social issues, including the possibility of damage to bridges and pavements if vehicles are overloaded.

115. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

116. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.

117. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Other borrow material must be taken only with the consent of the land owner, and must be in compliance with provincial environmental regulations. If found to be in violation of existing regulations, the contractor will be fined and be required to completely rehabilitate and re-vegetate the site(s).

118. The contractor will ensure that the removal of productive agriculture land and soil cover (vegetation) is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

119. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.

120. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.

b) Mitigation Measures

121. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA /Local Municipal Authority approved site. New soil should be brought in as required so that the ground surface is re-established.

122. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.

123. Water channels must be diverted properly and a protection mechanism provided. Alternatively construction should be undertaken during the dry season.

124. Surface water in channels will be monitored against “irrigation water quality standards” of Water and Power Development Authority, WAPDA. Ground water quality use for human consumption will be monitored against the National Drinking Water Quality Standards.

9. Damage / disturbance to Utilities Services

a) Description

125. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

126. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance

a) Description

127. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

128. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

129. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitoes and rodents.

130. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.

131. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.

132. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

133. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or enter streams where it can affect downstream water quality, aquatic environments and human health.

134. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.

135. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area where cement dust is in the air.

136. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to ensure compliance with the requirement of dust masks.

12. Interruption/ Contamination of Water channels

a) Description

137. There are forty one watercourses crossing the project road: details were given in table 5. Repair or replacement of the crossing will often require temporary diversion of, or work within, the watercourse. This could affect the water supply to agriculture land of communities living nearby, and could lead to contamination.

138. Temporary traffic diversions disrupt and can be a danger to traffic.

b) Mitigation Measure

139. Where water crossings are being repaired. The water channel should be diverted or a protection mechanism provided to avoid contamination. Where possible, construction will be made in dry season.

140. The contractor should provide an adequate sized diversion so that there shall be no disturbance to water flows of canal /water course.

141. A traffic management plan shall be provided by the contractor. Signage and lighting may also be provided to reduce the likelihood of accidents.

142. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed

13. Pressure on Local Resources

a) Description

143. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife. The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

144. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

14. Inadequate Camp Site Good Housekeeping

a) Description

145. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

146. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.

- Train work force in storage and handling of materials
- Fire fighting
- Camp sewage will be treated in pit latrines or septic tanks which will be drained and sewage taken to a sewage treatment plant for processing. The treatment/management will be done according to the provision defined in the Pakistan EPA-specifications, which the contractor will have to become familiar with. Disposal will be recorded in a table and submitted as part of the semi-annual reporting to ADB.

147. Contractor will prepare as part of site specific EMP the following special sub-plans:

- Traffic management plan-addressing construction related delays and a protocol for day-to-day management. Traffic management is also addressed in the contract specifications for the engineering works.
- Waste management plan specifying the treatment and disposal of garbage, sewage and oily waste at the contractor's camps and yards.
- Borrow site management plan –addressing preparation of access roads and decommissioning following use, of any borrow sites opened by the contractor. Operating licensed facilities will not be included in this management plan, as they are already monitoring by the authorities.

148. The SSEMP, together with the sub-plans will be approved by the executing agency as well as the ADB, prior to the contractor mobilizing to the field

C. Operation Phase Impacts

Most of the impacts at the operation stage are positive and do not require mitigation.

These include:

- Improved access to markets
- Reduced travel times
- Lower vehicle operating costs
- Reduced dust

149. However there are some negative impacts and these are listed in the following sections.

1. Lack of Environmental Safeguards.

a) Description

150. While the proposed project will be completed adhering to environmental safeguards measured defined in the EMP and GoP standards, the contractor has to ensure the action taken during all stages are in compliance with this EMP.

b) Mitigation Measure

151. The contractor, will provide a mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released.

2. Increased Traffic Volumes

a) Description

152. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

153. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

3. Increased Risk of Accidents

a) Description

154. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.

155. The requirements of SPS 2009 have resulted in a road design that has had to balance road safety against the need to displace affected people encroaching into the road RoW .

b) Mitigation Measures

156. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds

157. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.

158. Traffic police should be trained to more consistently enforce road rules.

159. If accidents do occur, one of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties/fines should be sought.

V. GRIEVANCE REDRESS MECHANISM

A. Organisation

160. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Tando Muhammad Khan to Badin Road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.

161. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, a Grievance Focal Person (GFP) who can be Community Leader, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.

162.

163. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with affected village committees prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessibility to potentially affected persons.

164. Contact details will be distributed by the GRO to each village head in the appropriate local language, for posting in the village office.

165. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

166. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.

167. The first step ([Figure 5](#)) on receiving a grievance will be for the GFP to take up the issue with the GRO to refer the matter to the contractor, and given one week to respond to the grievance.

168. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.

169. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.

170. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.

171. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:

- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
- (ii) Updating the complaints database routinely;
- (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
- (iv) Collecting and submitting input for inclusion in progress reports for ADB.

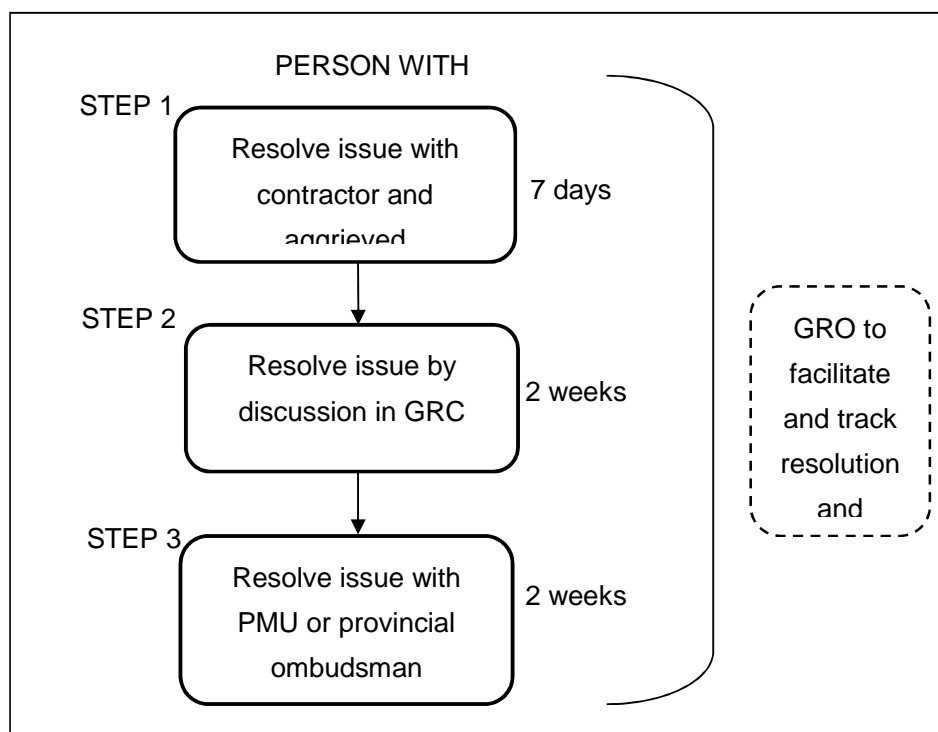


Figure 5. Steps of the Grievance Redress Process

VI. PUBLIC CONSULTATION

A. Objectives of Public Consultation

172. The overall objectives of the consultation process were as follows:

- To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
- To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
- To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
- To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

173. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Additional Deputy Commissioner-I and Municipal Office Tando Muhammad Khan. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.

174. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

175. Community consultations consisted of formal and informal meetings at Tando Muhammad Khan, Matli, Talhar and Badin City. The consultation exercise was conducted in both Sindhi and Urdu languages. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.

176. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.

177. The people interviewed ([Table 10](#)) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

178. A matrix of concerns raised by community members was prepared ([Table 9](#)). The register of attendance is provided as [Table 10](#). A pictorial record of the meetings is included as Annex 2

Table 9: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns raised by community	Remarks
Road design	Storm drainage should be provided at Matli and Talhar Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction / Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss at the TM Khan to Badin Road during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction

Issues	Concerns raised by community	Remarks
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	Construction will be programmed to minimise the length of disruption at any one point These issues will be addressed once road constructed

179. As appropriate these concerns have been incorporated into the EMP items.

Table 10 General Public attending Public Consultation at TM Khan- Badin Road

Name	Town/Village	Position /Occupation
Mr. Wadero Ammo	Matli /Baran Leghari	Village leader
Mr. Muhammad Yousuf Leghari	Matli /Baran Leghari	Farmer
Mr. Shahmir Leghari	Matli /Baran Leghari	Farmer
Mr. Ismail Leghari	Matli /Baran Leghari	Restaurant /Tea Shop
Mr. Bukhtiar Ali	Matli /Baran Leghari	Farmer
Mr. Sultan	Matli /Baran Leghari	Labor /Famer
Mr. Nabi Bux	Matli /Baran Leghari	Farmer
Mr. Sonharo	Matli /Baran Leghari	Farmer

Name	Town/Village	Position /Occupation
Mr. Soomro	Matli /Baran Leghari	Farmer
Mr .Baran Leghari	Matli /Baran Leghari	Farmer
Mr. Vessria	Matli /Baran Leghari	Farmer
Mr. Mashooq Ali Shah	Tando Ghulam Haider	Shopkeeper
Mr. Taj Muhammad Shah	Tando Ghulam Haider	Village Leader
Mr. Qabool Muhammad Shah	Tando Ghulam Haider	Teashop
Mr. Inyatullah Shah	Tando Ghulam Haider	Farmer
Mr. Liaquat Ali Shah	Tando Ghulam Haider	Farmer
Mr. Mahesh Kumar	Talhar	Fertilizer Dealer
Mr .Kishore Kumar	Talhar	Fertilizer Dealer
Mr. Dilip Kumar	Talhar	Fertilizer Dealer
Mr. Rakesh Kumar	Talhar	Shop owner

3. Government Agencies

180. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices (Table 11). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below. Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in Annex 2.

<u>181. Name of Stakeholder Representative</u>	<u>Type of Stakeholder</u>	<u>Department / Occupation/ Designation</u>
Mr. Aijaz ul Hassan	Provincial Government	District Municipal Administration
Mr. Shakeel Memon	Provincial Government	District Municipal Administration
Mr. Sikandar Ali Bhatii	Provincial Government	District Municipal Administration
Mr. Kishore Kumar	NGO	Thar Deep
Mr. Muhammad Hussain	NGO	HANDS

a) Assistant Deputy Commissioner-I (Tando Muhammad Khan)

182. A meeting for consultation was held with Assistant Deputy Commissioner I Mr. Aijaz ul Hassan. He raised the following points after welcoming the proposed project activity in his area of command. The meeting was held at the Office of the Assistant Deputy Commissioner Office Tando Muhammad Khan. Their views are as under:

- Local people should get preferential treatment for the employment on the road project;
- A suitable alternate route should be made available during project execution, proper diversions shall be maintained;
- Rice husking traffic will need to be managed in the area of Rice Mills.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the TMK; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents.
- He also suggested that this road may be constructed with dual carriage way, as heavy traffic uses this road and due to the various Oil and Gas fields in the area, traffic is increasing day by day.

b) Chief Sanitary Inspection Tando Muhammad Khan

183. A meeting was held with Chief Sanitary Inspection Officer I, Mr Shakeel Memon. The meeting was held at the Assistant Deputy Commissioner Office Tando Muhammad Khan. After welcoming the project, he raised the following points.

- Generally they supported the project and were of the opinion that there is a dire need of these kinds of projects shall be started as soon as possible.
- He mentioned that there is no proper landfill site for the solid waste / construction waste material disposal in the TMK; waste generated from the city is being dumped in the ditches at private lands upon their request.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that during the construction phase proper alternative routes shall be provided to avoid the accidents.

- He also suggested that during session of Sugar-cane crushing and rice husking traffic shall be managed in the areas.

4. Non-Government Organizations

184. After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development and were consulted for this project. Mr. Muhammad Hussain from the NGO HANDS, Mr Kishore, Thar Deep made the following comments and suggestions;

- As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- Better road conditions will reduce the rate of accidents around the sugar mills
- Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.

C. List of Public and NGO Sector Stakeholders Consulted

185. A number of stakeholders, other than the general public, who are likely to be benefited or be involved during the project execution phase, were also consulted (**Error! Reference source not found.**)

<u>Name of Stakeholder Representative</u>	<u>Type of Stakeholder</u>	<u>Department / Occupation/ Designation</u>
<u>Mr. Aijaz ul Hassan</u>	<u>Provincial Government</u>	<u>District Municipal Administration</u>
<u>Mr. Shakeel Memon</u>	<u>Provincial Government</u>	<u>District Municipal Administration</u>
<u>Mr. Sikandar Ali Bhatii</u>	<u>Provincial Government</u>	<u>District Municipal Administration</u>
<u>Mr. Kishore Kumar</u>	<u>NGO</u>	<u>Thar Deep</u>
<u>Mr. Muhammad Hussain</u>	<u>NGO</u>	<u>HANDS</u>

Table 11 List of Public and NGO Sector Stakeholders

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Aijaz ul Hassan	Provincial Government	District Municipal Administration
Mr. Shakeel Memon	Provincial Government	District Municipal Administration

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Sikandar Ali Bhatii	Provincial Government	District Municipal Administration
Mr. Kishore Kumar	NGO	Thar Deep
Mr. Muhammad Hussain	NGO	HANDS

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

186. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects monitoring mechanism, defined in the EMP's two action tables.

B. The Environmental Management Plan

187. The EMP, mitigation and monitoring tables for the Tando Muhammad Khan-Badin Road project is included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs ([Table 12](#)) will be used to prepare a specific environmental safeguards section in the construction Bill of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

188. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

189. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential negative impacts. The value of the environmental assessment process can be

undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

190. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20m-25m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.

191. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.

192. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.

193. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

194. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which need to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit ESU (a section within the PMU), and will be mainly responsible for implementing the EMP.

195. There are fourteen construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically these actions focus on defining ways to minimize effects such as dust

generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp waste management.

196. A Site specific EMP (SSEMP) is to be prepared by the contractor, based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.

3. Operating Phase

197. The three actions defined for the operation period focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. There will be some increase in the speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2 during the consultation sessions). Speed limits will be monitored through traffic police as discussed earlier.

198. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:

- Reduced travelling time
- Better access to Market
- Fuel efficiency (less consumption)
- Less dust generation (since road surface will be sealed)
- Safer journey

C. Cost Estimates

199. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs, monitoring visits, training costs, and equipment. Table 12 shows the cost to be included in the BOQ items by the contractor, while Table 13 shows the environmental monitoring cost that will be borne by the IA through the PMU.

Table 12 EMP Implementation and monitoring estimated cost for Contractor

Items	Unit	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 191 persons)	Rs			465562	465562	931124

Items	Unit	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Generators & Construction Machinery Noise Monitoring	No.	7000	78	6552,000	6552,000	13104,000
Drinking Water Quality Monitoring (During Const)	Test	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	Test	8000	191	152,8000	-----	152,8000
Personal Protective Equipment (for 200 persons approx) replacing every year)	No.	????	200	1070000	1070000	2,140,000
Fire Fighting Equipment purchase and refilling	No.		30	250,000	100,000	350,000
Health & Hygiene	??	--	--	738960	738960	1477920
Noise Meter	No.	25000	2	50,000	----	50,000
Contractor's Environmental Officer	No.	150,000	1	1800,000	1800,000	3,600,000
Contingency Cost 10%						2,582,104
Total						28,403,148

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

200. The Sindh Provincial Road Improvement Project (PRIP) will be coordinated by the WSD as the executing agency (EA) with a project management unit (PMU) established within the WSD as Implementation Agency. The PMU will be strengthened to include capacity to implement and monitoring mitigative and monitoring actions defined in the EPM and social assessment reports.

201. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

202. The Project Management Consultant (PMC) will support the Deputy Directors and the PMU during all stages of project development. The PMC's environment experts will

support the ESU by ensuring that project road works comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 ([Table 13.](#)); and of course with the EMP

Table 13 PRIP Implementation Organization

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International ECIL
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

203. The ESU, with assistance from of the PMC's environmental specialist will:

- Prepare environmental screening checklists;
- Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
- Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
- Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
- Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors; and,
- Ensure that the required environmental training is provided to the staff concerned;

204. Contractor will hire two full time persons to address the environmental safeguards; Environmental Engineer's responsibilities will include;

- Prepare Site specific EMP as per generic EMP of this road.
- Monitor the work and undertaken the monthly reporting.
- Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
- Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
- Coordinate with PMU Environment specialist to conduct site visits.
- Impart trainings as per schedule.
- Prepare monthly environmental monitoring report

205. Environment inspector responsibilities will include;

- Conduct day to day Site inspection activities for any non-compliance
- Conduct environmental monitoring activities through certified environmental laboratory.

206. ADB's responsibility will be to review IEEs , approve the document and confirm that the GoP has completed it due diligence and also approved the assessment..

3. Monitoring and Reporting

207. Following section describes monitoring and reporting frequencies and responsibilities;

a) Implementing Agency

- The IA's Environmental Safeguards Unit will prepare a compliance monitoring checklist, based on the EMP and brief Environment Engineer of the Contractor on its use and implementation schedule. The checklist will be completed monthly.
- Carry out field visits for HSE compliance monitoring on quarterly basis
- The Implementing agency will use the compliance checklist reports, plus a semi-annual audit of the work as the bulk of the content of the semi-annual construction monitoring report to ADB..

b) Project Management Consultants

- Ensure the compliance monitoring is being carried out monthly, quarterly and semi annually during the construction period.
- If non compliance is recorded, conduct review meetings with Contractor to address the non-compliance.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, defining what mitigative actions have been undertaken and where this work was done.
- Conduct the Environmental Monitoring (Air, Drinking water Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in the EMP.

VIII. CONCLUSION AND RECOMMENDATIONS

A. Principal Findings

208. This, the Tando Muhammad Khan to Badin Road IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services Department.

209. The proposed rehabilitation/reconstruction work is expected to have very little negative environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites, fauna or flora. There is a minimal requirement for resettlement of roadside squatters and is being addressed in a separate LARP report

210. The following are the main issues identified and concerns raised during the study:

- The project is in predominantly bad condition and travelling time is around double the time that would be expected for a road in good condition;
- The road embankment is eroded in some places;
- There are mosques, graveyards and shrines built impinging to the ROW of the project road no cultural or sensitive structure will be affected.
- There are major and minor canals and waterways crossing the road, requiring special care during construction works
- There are six wetlands located in District Badin. All are far from the project road and will be unaffected.

B. Conclusion

211. The improvement of the Tando Muhammad Khan to Badin road, is limited to road reconstruction within the existing right of way. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.

212. Provided the EMP is followed, there should be no damage to cultural and archaeological sites. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by the Contractor, Environment Specialist of the PMC as well as the WSD. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.

213. This IEE study concludes that the proposed road project will not lead to significant adverse environmental and social impacts of such nature or magnitude, and that a more detailed report in the form of an EIA is not needed. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.

214. The project has been discussed with local people, government officials and NGO, yielding general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust. There was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

215. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.

216. The following recommendations are carried over from the text:

- Environmental monitoring, via close adherence to the EMP will be carried out by the IA and the contractor, in order to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
- The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
- Trees located on the embankments will not be disturbed.
- Asphalt plant shall be located at least two kilometres from settlements
- Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
- Excavation of earth fill will be limited to an appropriate depth of 20cm.
- Canals and other water resources will be closely monitored to ensure no blockages occur as a result of the work and that no contamination of the surface water occurs during the construction period.
- A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
- Health and safety plans will be prepared.
- Construction work shall not hinder local people's access to nearby facilities.
- SSEMP will be developed by the contractor which needs to be reviewed by the PMC, approved by IA and final approval is required from ADB. Contractor will not be able to start the construction till the SSEMP is not approved.

- An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
- Grievances redress mechanism will be implemented by the IA and adhered to by the contractor to ensure that community complains are addressed and recorded.

Annex 1

Table 14 Environmental Management Plan: Environmental Mitigation Table (EmiT) and Environmental Monitoring Table (EmoT)

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for TM Khan to Badin road	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	<p>Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed.</p> <p>Use of soil from private land will be minimized and only after consultation with and compensation of landowners.</p>	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	No cultural or archaeological sites have been identified in the TM Khan to Badin road and thus no mitigation measures are required.	----	---	-----	-----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	NA	WSD	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.				
1.8. Contractor's Environmental Safeguards Capacity	Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Plan to be provided the Consulting Engineer and PMU prior to start of work	WSD	WSD	Supervision Consultant
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	setting strict speed limits of no more than 30kph in or near settled areas.				
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor				
2.4 Increase in air pollution from vehicular and machinery exhaust	Emissions will be minimised by: i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, iv. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution.	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.5 Disposal of Spoil and Solid Waste					
2.5.1 asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.5.2 Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	<p>i The contractor will identify dumping locations for construction debris and non-hazardous solid waste with TMA Tando Muhammad Khan, TMA Badin and EPA Hyderabad.</p> <p>ii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.</p>	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise & Vibration					

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.6.1 Noise and Vibrations associated with earthworks and haul roads.	<p>i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village.</p> <p>ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800.</p> <p>iii Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities.</p>	During Construction period	Construction areas	Contractor Inspector	EHS Supervising Consultant
2.6.2 Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor Inspector	EHS Supervising Consultant
2.7 Quarry/Borrow Materials					
2.7.1 Overloading of trucks, may damage pavement, bridges, and culverts	. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be	Throughout construction period	Construction sites	Contractor Inspector	EHS Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	required to monitor the transport of material, recording vehicle movements and weights, to be inspected.				
2.7.2 Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor Inspector EHS	Supervising Consultant
2.7.3 contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			
2.8 Contamination of Water Resources (Surface & Ground)					
Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>				
<p>2.9 Damage / disturbance to Utilities within RoW</p>	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Before the start of construction work. Design phase.</p>	<p>Where utilities services located</p>	<p>Contractor Inspector EHS</p>	<p>Supervising Consultant</p>
<p>2.10 Traffic Disturbance</p>					

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor Inspector EHS	Supervising Consultant
2.11 Health and Safety Concerns					
2.11.1 Protecting the workforce and maintaining a safe working environment. 2.11.2 Transmission of communicable diseases (such as STI's and	i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides. ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with	217. Construction period	218. Construction Camps, Construction sites and Asphalt Plant area	219. Contractor EHS Officer	220. IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
HIV/AIDS) to the local community.	<p>masks of a micron size, capable of capturing dust down to 2 microns.</p> <p>iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment.</p> <p>v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD &STI).</p>				
2.12 Intruption /Contamination of Water channels					
Movement/drainage of surface water interrupted due to improper construction activities, inadequate diversions and notifications.	<p>i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course.</p> <p>ii. Protection mechanisim should be provided to avoid contamination.</p> <p>iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate</p>	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	diversions, with signages and lighting arrangements, to avoid any accidents. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed				
2.13 Over Used Local Resources					
Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
2.14 Contractor Good Housekeeping Practices not Applied					
Contractor's work areas and camps not maintained, no proper waste management, environmental health and safety measures.	i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established iii. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. iv. Once the site is no	Throughout the construction period	All construction camps , work areas and contractor 'yards'	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.				
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD & Contractor	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	-
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed limits shall be monitored by the traffic police to avoid any accident and	Operation period	As per design	Contractor and Traffic police	ES/PMU /IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	subsequent spillage. An emergency service may be provided by the local authorities.				

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP	Before the tendering and before contract finalized	Date and time that confirmation completed filed with PMU	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Monitor to obtain copy of plan and record compliance—for presentation in smi-annual audit report	Prior to start of construction	Date and time that confirmation completed recorded & filed with PMU	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and compensation of losses Land owners will be compensated This will be monitored through ES- PMU</p>	Monitor checks that topsoil management steps prepared and ready for implementation	During Planning phase, in parallel with the preparation of bid documents	Copy of topsoil protection actions	PMU	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	There are no cultural or archaeological sites found in the Tando Muhammad Khan to Badin road and thus no mitigation measures are required.	----	---	-----	----	-----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report	Prior to contractor mobilization	Written and dated note indicating compliance & inspection	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	The work along this road will affect the access from a business and residence to the road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the	Review of plan and confirm a) consultation action proposed b) inclusion of timetable and c) inclusion of clean	Completed prior to contractor mobilization and provided the contractor as part of the contract	Written and dated note indicating compliance	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access	up and reconnection action.	documentation			
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<p>i. The Contractor will be required spray water on unsealed roads and work areas daily, within villages and past houses located close to the road and giving priority to sealing in urban areas.</p> <p>ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas.</p>	Travel work areas and check for dust—and if found take immediate action with contractor	Anywhere where there is material moved, earthworks cutting and filling.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	<ul style="list-style-type: none"> i. Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate action with contractor. ii. Inspect batching plant dust suppression mechanism, its maintenance log book. 	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in 	<ul style="list-style-type: none"> i. Check query sites for depth. ii. Ensure contractor store topsoil properly, and restore query site as much as possible at end of work. iii. Ensure Land owner get adequate compensation 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken	WSD	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	agreements between the land owner and contractor					
2.4 Increase in air pollution from vehicular and machinery exhaust	Emissions will be kept to a minimum by: <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes and iv. Equipment maintenance specifications will be imposed through construction inspection and regular reporting. v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	Record findings and conduct regular inspections in association with construction supervision	Throughout the construction period	Inspection note to file for use in contractor reporting and in semi-annual audit report	PMU	Supervision Consultant
2.5 Disposal of Spoil and Solid Waste						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps.	<p>i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with TMA Tando Muhammad Khan, and TMA Badin and EPA Hyderabad.</p> <p>ii. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
2.6 Noise & Vibration						
i. Noise and Vibrations associated with earthworks and haul roads.	i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village, Same approach is to be taken if the other site is used.	Using a portable noise meter, monitor checks conditions , and inspects if work conducted within permitted time	Throughout construction period	Inspection note, signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	ii. Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800. iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.	period on urban zones				
ii. Excessive Noise at sensitive sites, identified in IEE, i.e. schools, residential areas, mosques, health care centers	ii. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Noise measurements at these sites recorded by monitor and if exceeding, immediate action to erect temporary barriers	Throughout the construction period	Inspection note with noise reading results	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						
i. Overloading of trucks, damaging pavement, bridges, culverts etc	i. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials	Throughout construction period.	Inspection note re findings, dated and signed		
2.8 Contamination of Water Resources (Surface& Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out</p>	Regular inspection of work camps, contractors yard, fueling areas , fuel storage	At least monthly throughout the construction period.	Checklist showing check fuel and lubricant handling, waste oil management , machinery was down water control, etc. signed and dated--filed. Checklist showing the	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing.</p> <p>iv. All diversions must be checked for Signages and lightings on weekly basis,</p>	<p>Regular monitoring of diversion for and lightings</p>	<p>At least fortnightly where diversions are placed</p>	<p>check for lighting and signages signed and date filled</p>		
<p>2.9 Damage / disturbance to Utilities within RoW</p>	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Review of notifications and approvals from all utilities as per the legal requirements</p>	<p>Before the start of construction work. Design phase.</p>	<p>Inspection note re findings, dated and signed</p>	<p>PMU</p>	<p>Supervision Consultant</p>
<p>2.10 Traffic Disturbance</p>						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Inspect construction areas where access is an issue and establish if contractor is managing problem and if local residents are satisfied	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.11 Health and Safety Concerns						
i. Protecting the workforce and maintaining a safe working environment. ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.	i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides. ii. ii.Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment. iii. All Construction labour and staff of the contractor and consultant will	Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	briefed in STD's and given option to be tested (personal choice).					
2.12 Interruption /Contamination of Water Sources						
	<ul style="list-style-type: none"> i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanism should be provided to avoid contamination. iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents. iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed 	<p>Inspection of diversion along the road, check signages, lighting any leakage etc at the diversion and rectify through contractor.</p> <p>Ensure contractor has adequately restored temporary land.</p>	Culverts and bridges	Contractor EHS Officer	IA /PMU	Supervision Consultant
2.13 Over Used Local Resources						
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern	Throughout construction period—at least once when work is near or in a community	Meeting note signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
2.14 Contractor Good Housekeeping Practices not Applied	<ul style="list-style-type: none"> i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established iii. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation. 	Inspect all camp operations including worker housing and all waste management procedures	Throughout the construction period while work camps are in operation	Inspection note re findings, dated and signed	PMU	Supervision Consultant
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released	Obtain completion report and review for compliance	1 month before the end of the construction period	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	WSD	WSD

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	will be erected in urban areas.					
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

Initial Environmental Examination

P46377-PAK
TA 8406-PAK
July 2015

PAK: Provincial Road Improvement Program: Rehabilitation of the Mirwah to Naukot Road

Prepared by the Engineering Consultant International Pvt. Ltd. (ECIL) for the Sindh Works and Services Department and the Asian Development Bank.

This initial environmental examination is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature. In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

Initial Environmental Examination

June 2015

TA 8406-PAK: Provincial Road Improvement Program:
Rehabilitation of the Mirwah to Naukot Road

Prepared by the Engineering Consultant International Pvt. Ltd (ECIL) for the Sindh Works and Services Department and Asian Development Bank.

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Abbreviations

ITEM	UNITS	DEFINITION
ADB		Asian Development Bank
ADB SPS		Asian Development Bank Safeguard Policy Statement 2009
CEWP		Construction Environmental Work Plan
CO	mg/m ³	Carbon monoxide
dBA	dB	Decibels (A measure of audible noise)
EARF		Environmental Assessment and Review Framework
EIA		Environmental Impact Assessment
EMP		Environmental Management Plan
ES		Environment Specialist of Project Management Unit
GRM		Grievance Redress Mechanism
GFP		Grievance Focal Person
IEE		Initial Environmental Examination
IRI		International roughness index
km		kilometres
Km/h		Kilometres per hour
m		metres
mm		millimetres (1/000 metre)
masl		metres above sea level
NEQS		National Environmental Quality Standards
NO ₂	mg/cm ³	Nitrate or Nitrogen Dioxide
PEPA		Pakistan Environmental Protection Agency
PMU		Project Management Unit
PPP		Public Private Partnership
RAP		Resettlement Action Plan
RoW		Right of Way
SNEQS		Sindh National Environmental Quality Standards
SO ₂		Sulphur dioxide
SPS 2009		ADB's 2009 Safeguard Policy Statement
SSEMP		Site Specific EMP
TPM	micrograms /m ³	Suspended particulate matter, with particles ≥ 10 microns in size, and a danger to lungs. Also referred to as PM ₁₀
S-EPA		Sindh Environment Protection Agency

Executive Summary

The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this, GoS sought assistance from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads .

The road sections to be reconstructed or rehabilitated were selected from an initial list of 700 km of roads, then ranked in order of importance (primarily based on the traffic volume) and road condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province resulting in a short list of six roads totalling 391 km of which 328km will be reconstructed or rehabilitated under the ADB loan. Reconstruction involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface. Rehabilitation involves roughening or applying a tack coat to the current riding asphalt layers to improve adhesion if it has become polished; and providing an overlay of new asphalt base and riding courses.

This report is Initial Environmental Examination (IEE) for the reconstruction of road number 6, the 64 km Mirwah to Naukot Road which links the N120 National Highway at Mirpurkhas district with the Naukot District Tharparkar. The report has been prepared pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).

The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centreline. Both rehabilitation and reconstruction within the existing carriageway are ADB category B works, requiring an IEE.

Most of the environmental impacts such as shorter travelling time, better access to market, fuel savings, and less dust are positive and do not require mitigation. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate Land Acquisition and Resettlement Plan report. However there are some adverse impacts during project preparation construction and operation.

Preconstruction Period: Environmental assessment documentation and the Environment Management Plan (EMP) are prepared and approved during the preconstruction period and translated into the local languages for distribution to all stakeholders. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex -1) identify actions to be undertaken by the Sindh Works and Services Department (WSD) and

the Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WSD and any contractors on the EMP and the actions to be undertaken. WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

Construction Period: Construction phase EMP actions focus mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

Many of the culverts are blocked, damaged or poorly sized. Where the road is widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary road diversion, or to close one side of the road at a time and institute traffic controls. Repair of the road once culverts are replaced will follow a specific procedure defined in the EMP. It may also be necessary to provide temporary diversion for the water around the area being worked. Ideally the work will be undertaken in dry season when water flows are minimal.

Any mosques, graveyards and other cultural sites that could potentially be affected by the work were identified. In the event, only one mosque, located at chainage 4+200-4+300, will be marginally affected. There should be no damage to other cultural sites or to any archaeological sites. Only three trees need to be cut, while trees on the embankments need not be disturbed.

Appropriate mitigation protocols are defined in this IEE. A detailed inventory of the sites showing the approximate location of the structures is provided in the IEE. By applying careful highway design all other potential impacts can be avoided. However care will need to be taken during construction activity.

Operating Period - Operation period actions focus on confirming that the contractor has completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as road safety. Speed limits will need to be monitored by traffic police.

The project has been discussed with local people, government officials and NGO as recorded in the IEE annex. There was general support for the project, with no serious issues raised. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust during construction. There was also a concern about safety, during construction, but generally a view that improved road conditions would improve safety.

A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the EMP. All impacts are minor and able

to be mitigated. This IEE study authors concluded that the proposed road project will not lead to significant adverse environmental and social impacts. Careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements. The environmental safeguard implementation will have to be monitored by concerned agencies, including the Contractor, the Environment Specialist from the provincial environmental safeguards unit, the PMU and WSD. Due diligence, with mandatory coordination among various stakeholders will further ensure mitigation of any adverse impacts.

The estimated cost of implementing the EMP is Rs 35,223,892 for the contractor including a 10% contingency.

I. INTRODUCTION

A. The Project

1. The Government of Sindh (GoS), through its Work and Services Department (WSD), aims to provide an affordable, safe and sustainable road network in the province. To help achieve this aim, GoS requested a loan from the Asian Development Bank (ADB) to reconstruct or rehabilitate up to 400 kilometres (km) of deteriorated roads.
2. The worst sections of the project roads will be reconstructed, involving the removal of surface pavement, building up and in some cases widening of the sub-base layers and providing a new asphaltic concrete base and riding surface. Other sections will be rehabilitated; involving scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses.
3. The road sections to be reconstructed or rehabilitated ([Table 1](#)) were selected from an initial list of 700 km of roads by ranking the roads in order of importance (primarily based on the traffic carried) and condition. The initial technical ranking was adjusted to ensure a more even distribution of roads across the province. A road map of Sindh showing the selected roads is shown as

Table 1 List of Selected Roads

Road sections	Km	Km under ADB loan
Kandhkot – Jacobabad (01)	77	77
Jacobabad – Ratodero (02)	55	32
Khyber – Sanghar (03)	64	64
Sanghar – Mirpur Khas (04)	64	64
TM Khan – Badin (05)	67	67
Mirwah – Naukot (06)	64	53
Total	391	238

4. A separate IEE has been prepared for each road. This IEE is for Mirwah to Naukot (road number 6).

B. Purpose and Scope of the IEE

5. The purpose of this IEE is to identify potential impacts during all stages of the road reconstruction and rehabilitation project, list actions that will prevent or at least mitigate any negative effects of the work and specify a monitoring programme for implementation by the Works and Services Department (WSD), ensuring that the actions discussed in the IEE are carried out in a credible and timely manner

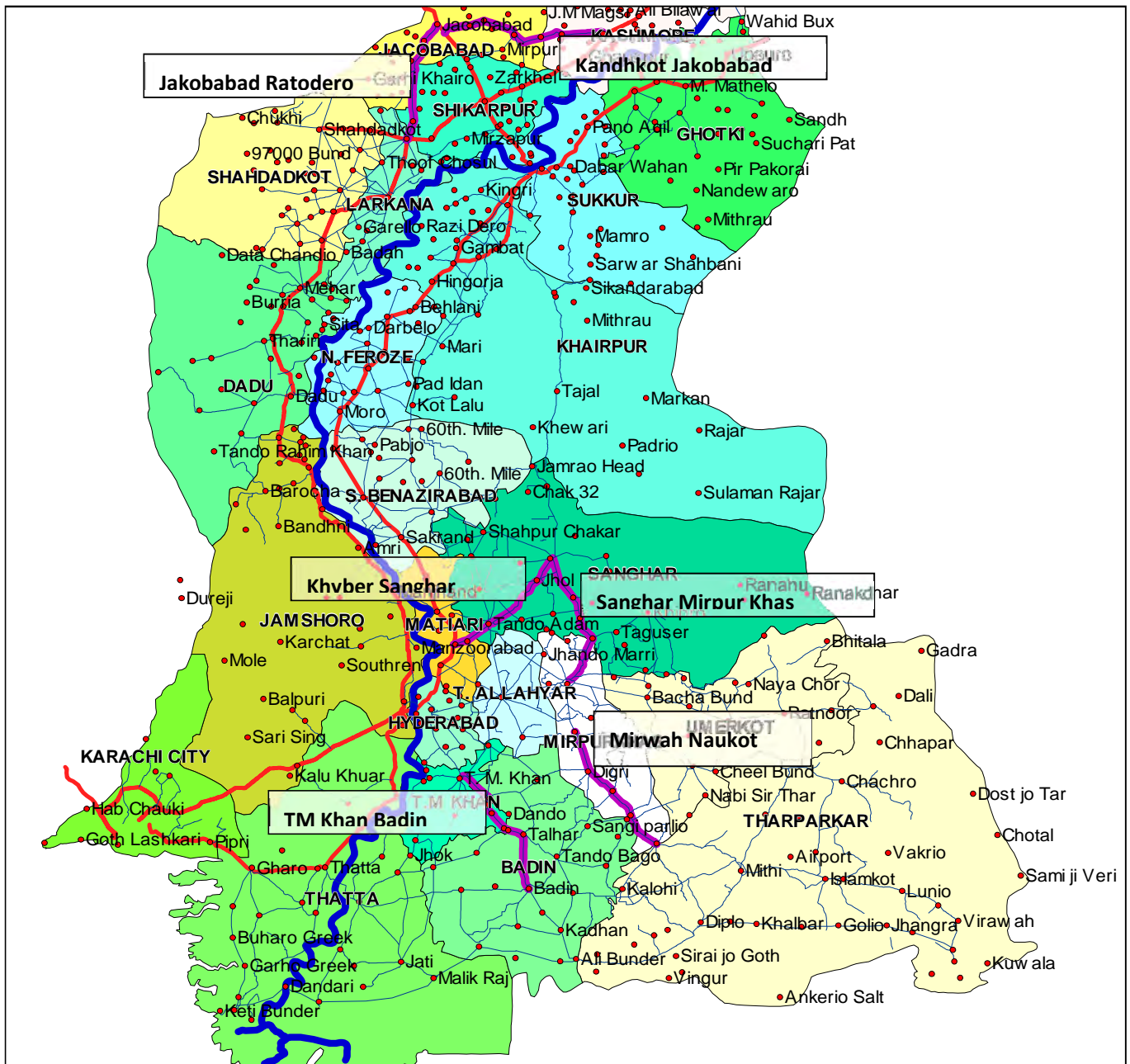


Figure 1 Sindh showing Project Roads; Project Roads in purple.

6. This IEE has been undertaken pursuant to the Pakistan Environmental Protection Act 1997, the Sindh Environmental Protection Act 2014 and ADB's Safeguard Policy Statement (SPS 2009).
7. The social and poverty impacts of the rehabilitation project are addressed in detail in a separate report.

C. Regulatory Framework and Environmental Classification

1. Pakistani Regulations

8. The Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations 2000 (“the PEPA regulations”), together with section 12 of the Pakistan Environmental Protection Act 1997 requires that every new development project in Pakistan is preceded by an environmental examination, leading to either no further action, an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) depending upon the magnitude of the project and severity of impacts anticipated during construction and once the project becomes operational.. The PEPA Regulation classifies all road rehabilitation and reconstruction, including reconstruction of existing paved roads as Category C, meaning that no environmental assessment is necessary and only a short justification statement need be submitted to the Sindh Environmental Protection Agency (S-EPA).
9. Other Pakistani regulations that apply are: the National Environmental Quality Standards (NEQS) 1997 and various amendments which makes it illegal to discharge any effluent or emit air pollution or noise exceeding the National Environmental Quality Standard; the Sindh Wildlife Protection Ordinance 1972, the Wild Bird and Animal Protection Act 1992 and various other amendments which make it illegal to undertake any project activity inside a protected area (national park, wildlife sanctuary, or game reserve) or to hunt or poach wildlife without special permission; the Cutting of Trees (Prohibition) Act 1992 which makes it illegal to cut or chop down trees without the prior permission from the Forest Department; and the Antiquities Act 1975 which prohibits new construction in the proximity of a protected antiquity and empowers the GoP to prohibit excavation in any area that may contain articles of archaeological significance. These Acts must be well understood by contractors, who must ensure compliance by their workers.

2. ADB Safeguard Policy and Project Classification

10. ADB’s Safeguard Policy Statement (SPS 2009) consists of three operational policies on the environment, indigenous people and involuntary resettlement. SPS 2009 provides information on good practice approaches to implement safeguards. Overall this policy aims to avoid or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process.
11. An initial screening of the project roads was undertaken to assess the potential impacts and risks. It was concluded that there will be limited, generally site-specific and reversible impacts that can be readily addressed through mitigation measures. In line with SPS 2009, this project is therefore classified as environment Category B and this IEE (including its Environmental Management Plan (EMP)) has been prepared consistent with ADB requirements for a category B project.

D. Methodology

1. Baseline Physical, Environmental and Social Data

12. The first task was to assemble all existing data on the road's physical condition and the proposed maintenance and rehabilitation actions to be applied. Using this knowledge, the project's corridor of impact – generally considered to extend 15m each side of the carriageway centreline – was identified and the existing ecological and social condition recorded. These data formed the baseline against which possible changes due to construction were defined.
13. The environmental assessment team completed a number of site visits to the road corridor to collect baseline environmental (physical and ecological) and social data.

2. Literature Review/Baseline

14. Legislative and regulatory requirements pertaining to the project were reviewed along with other available data and previous IEE/EIA studies conducted in the region. Studies reviewed included the following:
- Hyderabad Mirpurkhas Dual Carriage way Road Environmental Impact Assessment Study (Final Report); Prepared by Project Procurement International; October 2009.
 - ADB Assisted Flood Emergency Reconstruction Project (FERP), Upper Sindh Package Loan 2742-Pak, Initial Environmental Examination (IEE) Prepared by ECIL for Sindh Works and Services Department Government of Sindh, November 2011.
 - National Highway Development Sector Investment Program-Tranche3; Assisted by ADB; Environment Impact Assessment Study of Hasanabdal Havelian road Section E-35; Draft Report March 2012.
 - Road assessment Program India; Initial Environmental Examination report Assam; Project no 37066; Prepared by Ministry of Rural Development for ADB; June 2008.
 - Asian Development Bank, Safeguard Policy Statement Guideline; June 2009.
 - Sindh Water Sector Improvement Program: Environmental Impact Assessment for Works on Khipro and Mithrao Canal. September 2012.
15. In addition, the following web sites were reviewed and relevant information is included in this report.
- <http://www.meowweather.com> date visited: September 2014
 - www.pbs.gov.pk date visited: September 2014
 - <http://dearsir.pk> date visited: September 2014

3. Impact Identification

16. The activities to be undertaken in conjunction with or arising from the reconstruction or rehabilitation of the Project road were enumerated and the environmental impact of each action was assessed, taking into account the road's location and the existing environment. This included pre-construction activities, reconstruction and operation of the rehabilitated or reconstructed road.

4. Mitigation Measures and Environmental Management Plan

17. For each action with potential impacts, a mitigative measure, and action to either prevent or minimize negative effects, was identified and a monitoring requirement specified. These were compiled into a comprehensive Environmental Management Plan (EMP) which also identifies where and when actions will need to be undertaken and who will be responsible.

18. The list of activities, impacts and mitigative measures is included in the EMP (Chapter **Error! Reference source not found.** and Annex 1.

II. PROJECT DESCRIPTION

A. Project Description

19. The project is to reconstruct the provincial highway that links the N120 National Highway at Mirpurkhas district with the Naukot District Tharparkar. The road passes two provincial towns, Digri and Jhudo. When reconstruction is complete, the road will form a new provincial highway linking Tharparkar to the N120 for traffic to or from Umerkot, Mirpurkhas, and Sanghar Districts.

B. Existing Condition of Project Road

20. The road is in reasonable condition as far as Digri (18 km) and between Naukot and Mithi (47 km) but the middle 45 km is mostly in bad condition, which requires urgent renewal.

21. A typical cross section also showing the existing road is shown as **Error! Reference source not found.**

C. Re-Construction & Rehabilitation to be Undertaken

1. Scope of Work

22. The project design has allowed for the entire length of the Mirwah to Naukot road to be reconstructed with new sub-base, base and wearing course. It may be possible in some places to limit the works to pavement rehabilitation. The final decision will be made by the site engineer. This section describes the steps required for both rehabilitation and reconstruction, and the EMP provides for either or both actions to be taken. A full list of maintenance, rehabilitation and reconstruction actions, impacts and mitigations are included in the EMP

23. The proposed activities will be confined to the existing road right-of-way (RoW). For the purposes of this IEE, potential impacts were considered within a corridor extending some 15 meters on either side of the road centre line. Both rehabilitation and reconstruction within the existing carriageway are category B works.

2. Reconstruction of existing carriageway

24. Reconstruction work involves the removal of the asphaltic pavement base layers and granular sub-base layers, building up and in widening of the sub-base layers where necessary to achieve the desired profile and providing new granular and asphaltic concrete sub-base base and riding surface.

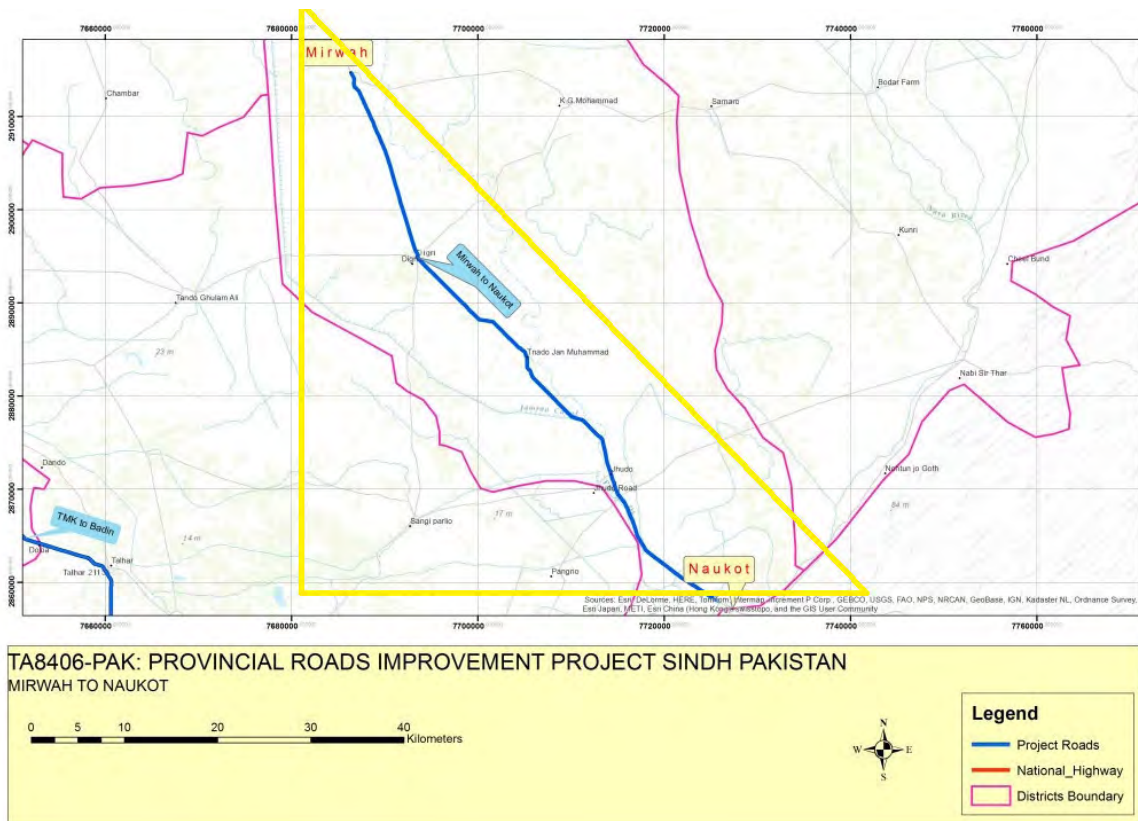


Figure 2. Pakistan showing the location of the Project road

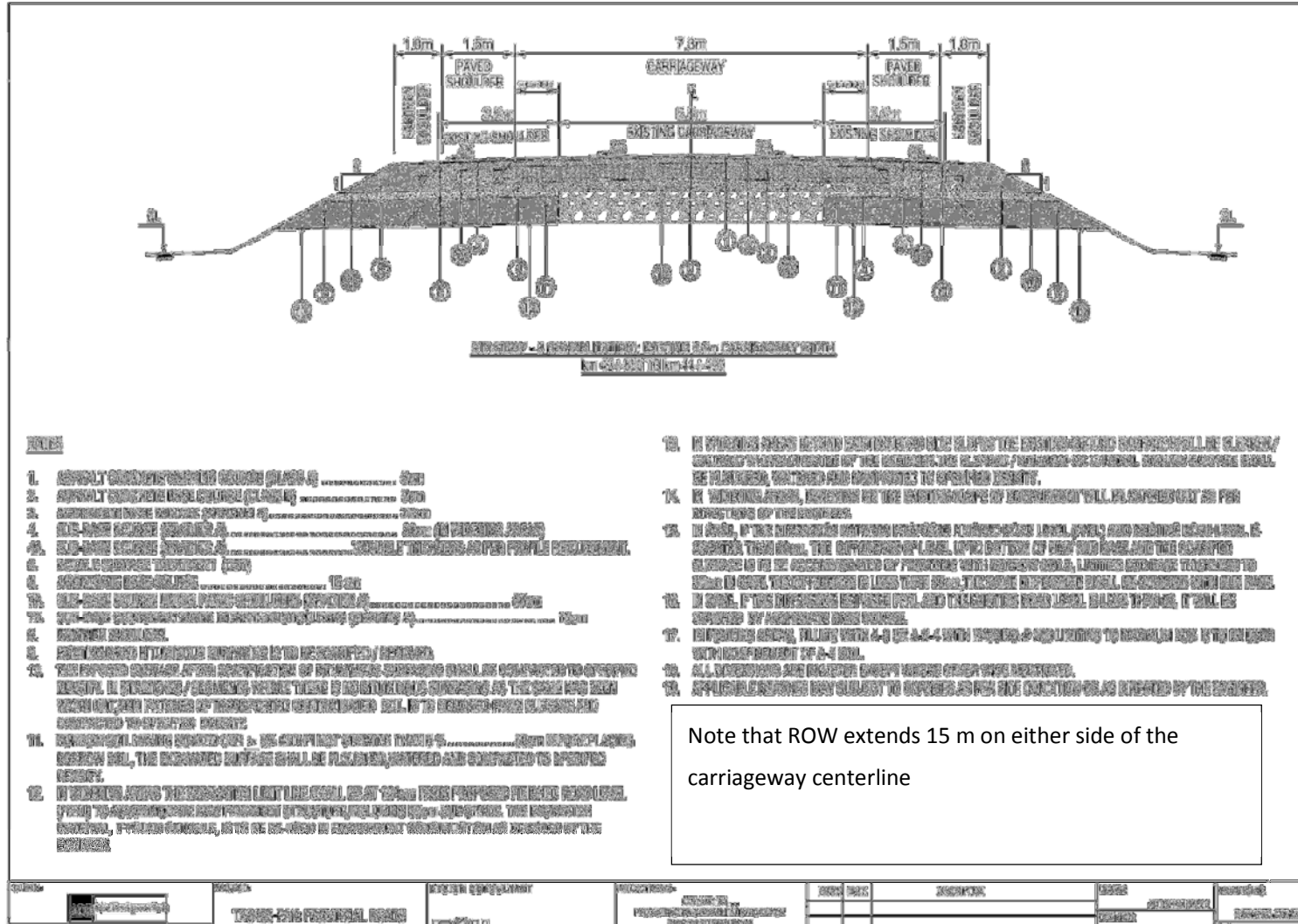


Figure 3 Typical Cross Section

25. The main steps involved in reconstructing a section of road are:

- i. Clear vegetation on the existing shoulder and 40 cm beyond the base of the shoulders (widened if required) to provide clear access to the construction site.
- ii. Remove and dispose of existing bituminous surfacing. Unsuitable or contaminated base and sub base material is also to be removed and transported to an approved disposal site.
- iii. Use borrow materials to repair the existing earthen shoulder. The shoulders shall be graded, watered and compacted to a specific density.
- iv. Use recycled or new crushed aggregate to provide a compacted aggregate base course over the width of the pavement (depth may vary as per profile)
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

3. Rehabilitation (Overlay)

26. Rehabilitation involves scarifying the current riding asphalt layers and providing an overlay of new asphalt base and riding courses. The key steps are:

- i. Clear vegetation on and up to 40cm from the base of the shoulders to provide clear access to the construction site
- ii. Use borrow materials to repair the existing earthen shoulder. The repaired shoulders shall be graded, watered and compacted to a specific density.
- iii. Any localized potholed cracked, distressed stretches / areas the patch work in full depth of existing bituminous layer(s) will be carried out before laying of new asphalt concrete layer.
- iv. Scarify existing bituminous surfacing. Material removed is to be transported to an approved disposal site.
- v. Lay an asphaltic concrete base course (depth may vary as per profile)
- vi. Lay a 50 mm asphaltic concrete wearing course
- vii. Place 150mm aggregate base course on the earthen shoulders and grade and compact to level with the top of the wearing course.
- viii. Apply road markings and install signage and safety barriers as applicable
- ix. Undertake any planting as appropriate

4. Rectification of Bridges

27. The process for bridges is as follows:

- Preparation of a complete bridge inventory
- Cleaning of all concrete surfaces including girders and transoms.
- Providing plaster to guardrails and posts including curbs wherever necessary.
- Cleaning expansion joints.
- Repairing training works wherever necessary
- New Deck construction (as & where required depending upon the deteriorated condition of Deck slab).

28. Only one bridge requires repair, this is located at chainage (44+685).

5. Reconstruction and Rehabilitation of Culverts

29. Many of the culverts are blocked, damaged or are inadequate. Where the road is to be widened, the culverts will need to be extended. To gain access to the culvert or to provide for a new culvert, it will be necessary to provide a temporary diversion or to close one side of the road at a time and institute traffic controls. Restitution of the road will follow the steps outlined in section II.C.2 above. It may also be necessary to provide a temporary diversion for the water channel. Ideally the work will be done in dry season when water flows are minimal.

30. The steps for repairing or replacing culverts is as follows:

- All vegetation shall be removed from culvert inlet and outlet up to 5m, from either side.
- Where water channels have to be diverted or construction, this will be done during the dry season and new culverts will be placed on a 30 cm thick sand cushion.
- Where culverts needs extension, provide a 300 mm sand cushion and place lean concrete as a base,
- New reinforced concrete slab culvert to be provided as per the drawings, Re decking of culverts as and where applicable
- The masonry side walls shall be deep pointed including replacement of parts of masonry which has deteriorated and re-laid with good quality bricks and mortar.
- In the base slab all pitting shall be rectified by providing bonding agent and a 75mm thick concrete cover with 10mm diameter bars placed at 250mm centres. Anchor bars shall be drilled into the base slab. The anchor bars shall be 13 mm diameter placed 600 mm centres and drilled 150mm into the base slab.

- The top slab shall be examined for any cracks which shall be repaired with epoxy injection.
- Where the concrete cover has broken and steel reinforcing is exposed, the area shall be marked and all rusted reinforcement shall be removed and replaced by better quality new steel of the same size and area and nailed to the concrete surface. In such areas, concrete shall be chipped to at least 75mm in thickness, a bonding agent shall be applied and concrete shall be applied in the form of plaster. Steel rods 15mm in diameter shall be drilled into the old concrete at 450mm centres and grouted.
- After rectification work is carried out all the areas shall be coated with a polymer reinforced cementitious waterproofing compound.
- The roadway and shoulders shall be restored following section II.C.2 above.

D. Construction Materials

31. Construction materials require transportation from the source to the work site as follows.
32. **Stone** -Stone for base course is available at Kotri quarry which lies at a distance of 130 Km from the NH5 end of the road at Hyderabad and N120 end of the road at Mirpur khas and towards provincial road Tharparker. It can be supplemented from Ganja quarry which is at a distance of 130 km from Mirwah
33. **Bitumen**- The National Refinery Karachi (255 km from Mirwah) is major supplier of bitumen for Pakistan, and supplies will have to be trucked to the local-area asphalt plant. There will be no problem in its procurement right from the source
34. **Cement** - There are quite a few cement factories in the vicinity of project road, namely Pak Cement Factory in Hyderabad (95 km from Mirwah), Lucky Cement Limited and Power Cement Factory in Nooriabad (185 km from Mirwah)
35. **Sand**-Good quality of sand is available at Bollori which is 15 Km beyond Kotri quarry as well as from Jamshoro which is in the vicinity of Hyderabad (102 km from Mirwah)There are other quarry sites available in the sub-project area which can be utilized. These are all within 115 km of where road maintenance and rehabilitation will take place.
36. **Steel Reinforcement (Rebar)**- The main Steel Industry of Pakistan is in Karachi. In addition, the following steel mills are being run in Hyderabad, and can supply rebar, but only after proper materials testing:
 - Mehran Mills
 - Islam Mills
 - Hyderabad Mills

37. The distance from Hyderabad mills to Mirwah, the project start location, is about 95 kilometers.
38. **Aggregate and Concrete** - Crushed stone aggregate for concrete is available in Nooriabad, Jamshoro, Petaro, all between 130 and 170 kilometres from the road.
- Crushed Aggregate for Asphalt Concrete Petaro Quarry
 - Sub Base (Muram) Kotri Quarry
 - Aggregate Base Course Petaro Quarry
 - River Sand From Indus River Basin
39. **Bricks**- The existing bridges and culverts have masonry abutments and piers constructed using locally manufactured bricks. There are many brick kilns along this project road.
40. **Water** -The Project road crosses a number of watercourses, minor and major canals. The Contractor will be able to use canal water for general construction purposes with the permission of State Irrigation Department and Sindh Irrigation & Drainage Authority. While the amount of water required is considerable, it is should be negligible when compared with the amount available. According to residents along the road, well water suitable for drinking is available at a depth varying from 12 to 14 meters.
41. **Reuse /Recycling of scarified material from the road surface** The material from the scarification / removal of the existing road surface is judged by the material engineer as being not suitable for use on the Project road due to its poor quality and the small quantities involved which makes recycling uneconomic. This leaves the following options.
- Option 1:** Waste material that meets required specifications will be used as fill when constructing or repairing the shoulders.
- Option 2:** Waste material can be used to refill borrow pits and covered with topsoil¹
- Option 3:** Scarification materials can be spread on earthen link roads, and compacted with rollers, improving the road surface as well as reducing road dust.
42. The total quantity of material to be disposed of is estimated to be 30,461 m³.

¹ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

III. DESCRIPTION OF ENVIRONMENT

43. The description of the environment of the project roads requires baseline data on the following:

- Physical Environment
- Ecological Resources
- Socioeconomic Environment

A. Physical Environment

1. Topography

44. Sindh can be divided into four distinct parts topographically: (a) Kirthar range on the west; (b) a central alluvial plain bisected by the Indus River; (c) a desert belt in the east; and (d) the Indus delta in the South. The Mirwah to Naukot road lies in the central alluvial plain.

2. Soils

45. The soils of the Project area are of recent alluvial origin and are basically suitable for irrigated agriculture. Although, stratification is complex, the majority of soils are within the range of fine sandy loam to silty clay loams with the latter being most common. Sandy soil can be found in the desert and sand mixed clay loam 3 -5 m in depth laid over sandy soils in project area. All soils contain calcium carbonate and most contain gypsum. Salinity is wide spread, but generally ephemeral: with adequate water and drainage, most soils can be reclaimed by simple leaching.

46. The alluvial deposits date back to the time when the Hakro River (Eastern Nara) flowed through this area during the Sama and Soomra period 1298-1520 CE² in Sindh.

3. Climate

47. The seasons in Pakistan can be best classified as

- Winter, from December to March
- Pre-monsoon (summer), April and May
- Monsoon, from June to September
- Post-monsoon, from October to November
- Summer season runs from April until October and winter runs from November to March.

² site visited on dated 18.01.2015

<https://thesalientfeaturesoftheruleofsoomradynasty.wordpress.com/category/soomra-dynasty/> site visited on dated 18.01.2015

48. Sindh lies between two monsoon zones, the southwest monsoon from the Indian Ocean and the northeast or retreating monsoon deflected toward Sindh by the Himalayan Mountains, but largely escapes the influence of both, resulting in a rainfall of only 150 to 180 mm per year.
49. For the Mirwah to Naukot road, the minimum and maximum mean monthly temperature, precipitation and relative humidity are given in [Table 2](#).

Table 2 Average Air Temperature and Precipitation in Mirpurkhas³

Mirpurkhas			
Month	Temperature °C		Precipitation (mm)
	Minimum	Maximum	
January	5.42	26.49	0.62
February	8.71	29.16	1.96
March	14.29	34.52	4.55
April	20.12	39.12	3.50
May	24.50	41.49	2.97
June	27.17	39.72	19.74
July	26.82	36.19	79.03
August	25.73	34.51	74.59
September	23.88	35.70	82.95
October	18.54	37.12	2.07
November	11.89	32.98	3.57
December	6.62	27.95	0.90

4. Air Quality and Noise

50. The Mirwah to Naukot road is located in a rural area and human activity is primarily related to agriculture with the major air quality issue being particulate matter (PM10) due to heavy dust which occurs due to the very dry and windy conditions. The situation is aggravated by human activity such as cultivation of the fields. Some dust is generated when vehicles overtake on unpaved shoulders. The incidence of this happening should be reduced with the Project.
51. Since WSD has not yet established its own environmental monitoring capacity, there is no comprehensive air quality and traffic noise monitoring data available. However, data are available for the Hyderabad- Mirpurkhas road, between 25 and 50 kilometres to the south of the project road ([Table 3](#)).

³ <http://www.meoweather.com> site visited September 2014

Table 3 Ambient Air Quality – Hyderabad – Mirpurkhas road⁴

S.NO	Test Method	Parameter	Units	Sample Location		GoP Standards (NEQS)
				Tando Allahyar	Tando Jam	
1	By Analyzer	Particulate Matter (PM ₁₀)	mg/m ³	0.967	0.539	0.150
2.	ISO-4221	Oxides of sulfur (SO _x)	mg/m ³	0.023	0.036	0.120
3.	ISO-6768	Oxides of nitrogen(NO _x)	mg/m ³	0.031	0.045	0.040
4	By analyzer	Carbon dioxide (CO ₂)	mg/m ³	546	701	----

52. Traffic volume is low and the adjacent land use is primarily agricultural. Both road and ambient noise levels increase when the project road enters into a town. Data is available for Tando Jam and Tando Allahyar two small to medium towns on the Hyderabad – Mirpurkhas road (Table 4) a nearby provincial highway that are considered typical of the expected conditions (Table 4). These noise levels are exceed for commercial area NEQS / GoP Standard in day time limits but are within the acceptable range for transport corridors as defined in Pakistan.

Table 4: Noise intensity in medium-sized towns⁵

Location	Noise intensity dBA	NEQS/GoP Standard	
		Day	Night
Tando Allahyar	72	65	55
Tando Jam	82	65	55

5. Hydrology

53. Sindh province is mostly irrigated through the Indus river system (canals and tributaries) and large aquifer sources of groundwater underline the Indus basin. They form an important source of water supply throughout the Project Area with many tube wells, motorized pumps and hand pumps in use. Groundwater in the Indus Basin is, however, of variable quality and tends to be non-saline only near the surface. Aquifers are recharged by means of seepage during flood season. The depth of the groundwater table varies from 3 meters to 25 meters along the route. Mirpurkhas district is irrigated by canals from the Guddu and Sukkur barrage system or by tube wells in areas not served by the canal network. There is one major canal, two minor canals and thirty water

⁴ EIA Mirpurkhas-Hyderabad dual Carriageway Units converted from ug/m³ and ppm to mg/Nm³

⁵ EIA Mirpurkhas-Hyderabad dual Carriageway

courses crossed by the Mirwah-Naukot road. These water sources run the entire year and are the major source of drinking water as well as water for irrigation.

54. Excessive irrigation and seepage from canals has caused water logging and salinization problems near Sanghar. Recent floods have exacerbated this problem, since farmers have converted inundated fertile agricultural lands into large aquaculture operations, whose waters generally evaporate, bringing salts to the soil surface.

6. Seismicity

55. According to the seismic zone map of Pakistan, the Project Area lies in the zone where minor to moderate damage can occur as shown in [Figure 4](#)

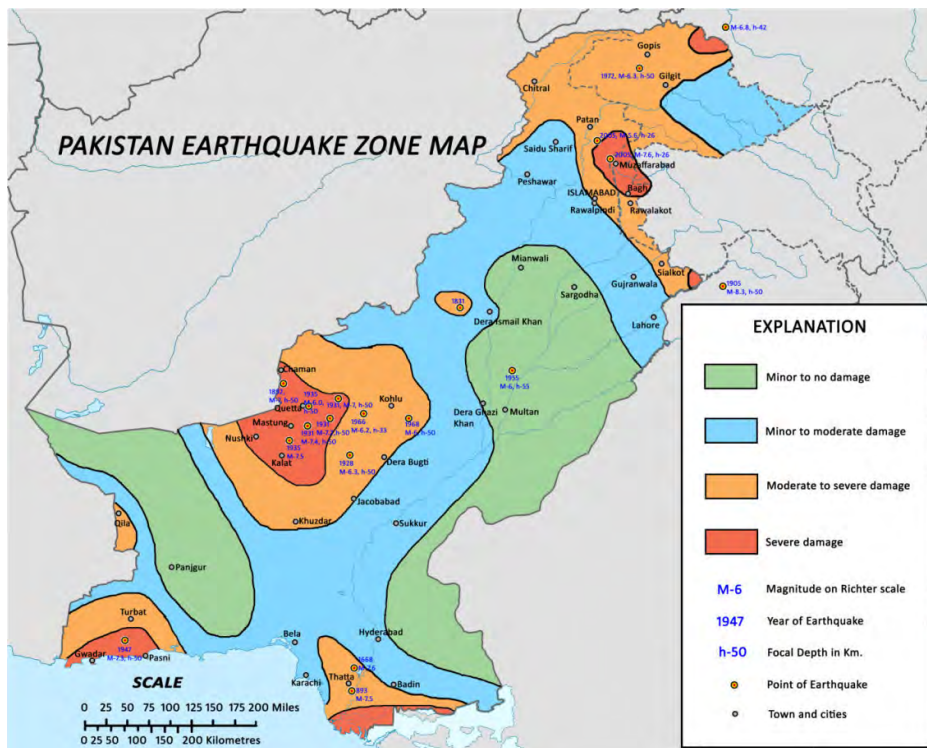


Figure 4 Pakistan Earthquake Zones

7. Archaeological and Cultural Resources

56. In order to identify potentially sensitive community structures, a survey of the Project impact area was undertaken between June 2014 and Sept 2014. Structures were identified through direct observation and by interviewing those living within the project area. Most of the structures were located near towns and urban areas.
57. Mosques, shrines and graveyards are of historical, cultural and religious importance for the people. Eleven mosques, two shrines and three graveyards were identified as being potentially affected by the proposed work on the Mirwah--Naukot road. A detailed inventory of the sites showing the approximate location of the structures is provided in

[Table 5](#). By applying careful highway design all potential impacts were avoided. However care will need to be taken during construction activity.

Table 5 List of Archaeological and Cultural Resources impinging to the ROW

S#	Road name	0-10			11-20			21-30			31-40			41-50			51-60			61-70		
		M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G	M	S	G
3	MW- NK	1	0	0	0	0	1	0	0	1	3	2	1	3	0	0	3	0	0	1	0	0
	Total	Mosque =11 , Shrines 2 and Graveyards 03																				

B. Ecological Resources

58. Due to the high intensity of human settlement, land cultivation and industry, undisturbed natural habitats are very limited. There is nevertheless still significant plant and animal diversity.

C. Flora

59. The Project Area falls within the Tropical Thorn Forest ecosystem, however much of the natural vegetation has been replaced by agricultural crops, mainly rice, sugarcane, cotton, maize, mong, mash, millet and sorghum sown in April-June and harvested during October-December; and wheat, gram, lentil, tobacco, canola, barley and mustard, planted in October-December and harvested in April-May.

60. The dominant trees in lower Sindh are babul (*Populous euphratica*), ber (*Zizyphus numularia*) and several varieties of *Tamarix* such as plai (*Tamarix gallica*) and jhao (*Tamarix diocia*), talhi (*Dalbergia sisoo*), kri (*Tamarix gallica*), karir (*Copparis aphylla*).

61. Of more concern would be damage to old plantations of *Azadirachta indica* (Neem), *Albizia lebbek* (Shrin), *Ficus religiosa* (Peepal), *Acacia nilotica* (Babul), *Cordia myxa* (Lasura) and *Ficus benghalensis* (Borh), and recent plantation of *Cornucopias*. These trees have significant medicinal value or are important culturally.

62. Among the grasses; Lumb (*Arislida depressa*), Chemmer (*Eleusine compressa*), Gorkha (*lasiurus indicus*) and Kana (*Saccharum bengalensis*) are found in the Project Area. Koondeor Dib (*Typha augustata*) is found along the water ponds scattered on both sides of the road.

D. Fauna

1. Mammals

63. Many decades ago, the project area was rich in wildlife but these have been depleted due to conversion of habitat to agricultural lands. Jackal, squirrel, fox, rats, mongoose and several species of bats are still found in the area.

64. Domestic animals including goats, sheep, camel, cows, donkey and buffalo are the dominant users of the land and have severely degraded wildlife habitat.

2. Reptiles

65. Reptiles include snakes such as cobra (*Naja naja*), rattlesnakes (*Crotalus horridus*) and rat eater snakes (several varieties). Small and medium sized lizards are also a common sight in the area. These include monitor lizard (*Varanus* sp.), spiny tailed lizard (*Uromastix hardwickii*) and fringed toed lizard (*Acanthodactylus contoris*). Turtles are also present in the area especially in the vicinity of moist lands, ponds, canals and during rainy seasons.

3. Birds

66. Important bird species found in the project area are the common crow (*Corvus brachyrhynchos*), common mynah (*Acridotheres tristis*), house sparrow (*Passer domesticus*) and common teal (*Anas crecca*). These birds are frequently visible along the roadside. Grey and black partridges (*Perdix perdix* and *Melanoperdix niger*), though present in the area, have been reduced to a minimum quantity due to excessive hunting. Other birds include Indian roller (*Coracias benghalensis*), crested lark (*Galerida cristata*), vultures (several varieties) and quail. White heron (*Ardea alba*) and black heron (*Egretta ardesiaca*) are also plentiful and inhabit the ponds located on both sides of project roads. Water birds, including white stork (*Ciconia ciconia*), white pelican (*Pelecanus onocrotalus*), little brown dove (*Spilopelia senegalensis*) and white throated king fisher (*Halcyon smyrnensis*) are most often found using the roadside ponds as feeding areas.

E. Ecosystems

67. There are no wildlife sanctuaries or national parks or game reserves located in the project area.

68. The Sindh Wildlife Department recognizes 13 game reserves in Sindh province, the closest is Khipro forest game reserve, some 75 km north west of the road.

69. The Nara desert provides refuge to a large number of wildlife in Sindh province. The Nara Canal Area, a chain of some 200 small, permanent and seasonal, freshwater, brackish and saline lakes and marshes stretching for about 150 km along either side of the Nara Canal from Sorah in the north to Sanghar in the south is known to be of great importance for wintering waterfowl and other wildlife. The Nara desert area is 30 kilometres to the north of the road and reconstruction of the project road will have no impact.

70. The nearest wetlands area is the Chotiari water reservoir, some 90 kilometres north-east of the road corridor.

F. Socio-Economic Environment

1. Road Transport

71. A traffic study was conducted to estimate the likely traffic on the road. Data were collected using video cameras, data logger and manual field observation. These data show the number of vehicles by type. Twenty four hour traffic counts for the subproject road are given in [Table 6](#).

Table 6 Twenty four hour Traffic count (number of vehicles) along subproject road

Location	Motorcycle	Car/ 4wd	Rickshaw	Vans/ PU	Mini bus	Bus	Trucks 2 Axle	Trucks 3 Axle	Trailer 4 Axle	Trailer 5 axle	Tractor trailer	Total
Mirwah - Digri	1689	275	988	153	173	21	99	50	3	1	264	3713
Digri - Jhudo	1689	275	988	153	173	21	99	50	3	1	264	3713
Jhudo - Naukot	4489	755	792	229	198	41	196	73	6	11	25	6814

72. The Consultant was advised that traffic levels can be significantly higher during the sugar and cotton harvesting seasons. The Consultant met with sugar refineries and cotton ginning mill operators to determine the annual loaded movements, the traffic catchment areas and the main destinations. Based on these discussions, the average annual daily traffic was estimated to be approximately 593 heavy vehicles a day (mainly 2 axle trucks and tractor-trailers); twice the number surveyed in June.

2. Structures Affected

73. During the topographic survey it is revealed that there will be no structures affected, including residential, religious and cultural sites. As per LARP recommendation section 2.1 and Table 2.1, except one small commercial structure will be partially affected. This encroachment is illegal but if people are moved or cultivated land is taken, compensation under SPS 2009 and ADB's Involuntary Resettlement Guidelines is nevertheless required. Resettlement is the subject of a separate land acquisition and resettlement plan (LARP).

3. Drinking Water

74. During the survey it was learnt that the water supplied by municipal authorities in the project area is generally not suitable for drinking due to inadequate treatment. Most

drinking water is surface water, but some communities and villages are totally dependent on ground water. The characteristic of ground water varies from location to location, with areas close to irrigational canals having comparatively better quality water while water in some other areas is saline.

4. Industrial and Commercial Activities

75. There is no heavy industry in the project area. There are a number of secondary industries within the district that support the agricultural economy such as rice husking, a sugar refinery, Cotton ginning and flour mills. There are also some brick kilns.

5. Employment and Income Sources in Project Area

76. Nearly all employment in the project area is in the agriculture or agriculture product processing sector. Most common jobs involve harvesting, picking, threshing, animal rearing transport driving and guarding. Local labourers commonly gain employment during the sugarcane harvesting season for crop harvest, loading and transport. Sugar mills in the surrounding area also employ skilled and unskilled labour. Various sugar mills and cotton gins create employment and continue to contribute significantly to the local economy.

77. Agricultural lands are owned by landlords and farmers work for a share of the crop. They live in the fields in small houses made from wet soil, cow dung and palm leaves. They graze cattle and grow vegetables for food.

78. Market places are typically located adjacent to the main roads where economic activity is highest. The grain and cattle markets are open every day except Fridays. Shops in the market places are mostly grocery shops and small hotels and are typically owned by local people. Smiths, workshops, hardware commodities and other house-hold items are available from stores in these markets.

79. Those not employed in agriculture include cobblers, carpenters, blacksmiths and barbers with lower incomes. Their daily wage is between Rs. 400 and 500, however, economic opportunities are limited and people face difficulties finding employment other than irregular temporary work. They are usually uneducated.

80. Agriculture is the most widespread source of income in the project area (65% of all income). Thirty percent of the population earn income as shopkeepers and kiosk holders, small business and as labourers in the sugar, cotton and rice industry and 5% are in government jobs in departments such as the agriculture department, forest department, post office, police, transport and the Pakistan army.⁶

⁶ Project of Sindh irrigation and Drainage Authority EIA report for Works on Khipro and Mithrao Canal; September 2012

6. Demography

81. The project road is located in the Mirpurkhas district, and the demography is diverse ([Table 7](#)).

Table 7 Demography of the Subproject road Mirwah to Naukot⁷

Factor	Mirpurkhas
Area sq.kms	2925
Population (Persons)	905935
Male	471096(52.00%)
Female	434839(48.00%)
Sex ratio (M:F)	108.3:100
Population Density	309.7 per km ²
Urban Population	300175(33.13%)
Rural Population	605760(66.87%)
Avg Household size (People)	6.1
Literacy ratio 10+	36.0%
Male	45.99%
Female	25.05%

82. Tribal people include Arain, Butt, Bheel, Chandio, Jamali, Khoso, Kolhi, Junejo ,Leghari, Memon, Malik, Lashari, Rind, Burdi, Syed, and Rahoo. Sindhi language is commonly spoken as mother tongue of majority of the communities in the project area. However, Balochi, Urdu, Punjabi and Siraiki languages are also spoken and understood.

7. Archaeological, Cultural and Historical Resources

83. There are no archaeological, cultural or historical resources in this corridor and none will be impacted by any of the work activities.

⁷ www.pbs.gov.pk

<http://dearsir.pk>

IV. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Design and Pre-Construction Phase Impacts

1. Lack of Environmental Capacity

a) Description

84. During the field surveys it became clear that the provincial and district government officials who will be charged with overseeing the construction are unfamiliar with the environmental impacts associated with road repairs and EMP implementation. As a result the likelihood of the mitigative and monitoring measures being implemented is low.

b) Mitigation Measure

85. During the preconstruction period and once the contractors have been selected the proponent, working with the Construction Supervision Consultant will complete a one day workshop to inform government agencies and contractors on environmental safeguards, the implementation of the project EMPs and credible environmental reporting. The workshop will be based on the presentation of examples and provision of templates for contractors and agency officials/inspectors to use

2. Lack of Integration of IEE/EMP Requirements into Construction Bid Documents

a) Description

86. The Bidding documents should reflect the requirement to select a qualified and experienced contractor. Bidding documents has greater emphasis on the methodology on the protection with regards to environmental and social worksite management. The bidder's environmental, social and safety methodology shows material deviation, reservation or omission towards environmental, social and safety specification.

b) Mitigation Measures

87. PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.

3. Loss of Vegetation and Trees

a) Description

88. There are various trees located on the both sides of the Mirwah to Naukot road. Trees close to the traffic lanes are a road safety hazard. Hence while from the topographic survey it appears that tree cutting can be avoided, it may nevertheless be necessary to meet road safety standards. There will be loss of vegetation in some locations, but

always within the road ROW According to the LARP report section 1 Table 1.1 Eight mature trees will be cut to pave the way for the required width of carriageway

b) Mitigation Measures

89. Loss of vegetation cover shall be minimized and the carriageway will be aligned so as to avoid the need to cut down trees if possible. New plantations will be included in the design of the right of way and trees will be replaced at a ratio of three trees planted for every tree cut down ,and which is more than 10cm Diameter Breast Height (DBH) .

4. Top Soil Erosion

a) Description

90. The top soil of RoW needs to excavate for reconstruction of the proposed project structure. It will erode and cause disruption local community and vehicle traveller as soil particles displaced and transported easily in air, water and may affect wide range of community assets.

b) Mitigation Measures

91. Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.

5. Disturbance to Archaeological and Cultural Sites

92. There are no cultural or archaeological sites found in the Mirwah to Naukot road and thus no mitigation measures are required.

6. Material Haul Routes

a) Description

93. Hauling of material have significant impacts on the community, public safety, traffic congestion, air quality and lifespan of the town road ways.

b) Mitigation Measures

94. Construction vehicles hauling materials along urban roads and anywhere where there are road side residence will be limited and the WSD will establish a route plan to minimize this disruption.

7. Consultation Plan with affected roadside landowners

a) Description

95. The road side and landowner may come across in relation to the road side schedule in installation of new fence, rubbish dumping, weed control and feral animal control which may cause disruption to the road side landowners.

b) Mitigation Measures

96. Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a road work information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.

8. Contractor's Environmental safeguards Capacity

a) Description

97. The responsibilities of safeguards unit reviews and finalize the document relating to environmental issues. Contractor with less capacity of safeguards do not comply with workplace environmental, social and safety regulations.

b) Mitigation Measures

98. Unfortunately contractors have a very poor record with complying with workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment

B. Construction Phase Impacts

1. Dust Generation: Transport of Materials

a) Description

99. A small increase in particulate matter (dust) is expected within construction air shed. Dust from vehicles hauling construction materials to the work sites will be a problem for roadside communities during the dry season, and has been known to impact people as far away as 200 m from the roadside.

b) Mitigation Measures

100. The Contractor will be required to have an approved (by The Construction Supervision Consultant) dust control program. This will involve i) regular sweeping of haul roads passing through settled areas if spills of material have taken place, ii)

spraying of water on unsealed roads and work areas within villages and past houses located close to the road, iii) sealing road surfaces in urban areas as a first priority and iv) storing construction materials close to the work site to minimise haul distances.

2. Dust Generation: Quarry and Batch Plant Operations

a) Description

101. All quarry operations generate dust primarily during the crushing operations to create aggregate. Batch plant, require cement and dry sand a gravel to be fed into a mixing chamber, and the addition of water to make concrete. Considerable fine dust in emitted when bagged cement is loaded manually into the batch plant hopper, as well as with the conveyor system bringing the materials to the plant.

b) Mitigation Measure

102. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted

3. Topsoil Erosion

a) Description

103. Excavation will expose bare soils that may erode. This will include sites such as; borrow pits, quarries, road embankments, culverts, bridge abutments and road diversions.

b) Mitigation Measures

104. Excavation of earth fill will be limited to an appropriate depth of 20cm. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor.

4. Emissions from Vehicles Exhaust

a) Description

105. Increase in air pollution from vehicular and machinery exhaust due to operation of construction machinery and increased movement of construction trucks will occur but will be minimal. The road repair and reconstruction work in relation to the existing traffic will generate relatively minor emissions.

b) Mitigation Measures

106. The Construction contractor will be required to keep equipment in good condition and to repair or replace vehicles producing visible black smoke and provide evidence that three vehicles have been given an emission inspection with twelve months of the start of the work. Secondly no construction vehicles will be left idling for more than two minutes.

5. Disposal of Spoil and Solid Waste

a) Description

107. As part of the reconstruction process, the asphalt layers of the existing road will be removed, together with base course material that is unsuitable for re-use. There will also be unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.

a) Mitigation Measures

108. The asphalt and base course removed from the existing road will be recycled⁸. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverised, spread on access roads and compacted.

109. The contractor will identify dumping locations for construction debris and non hazardous solid waste with respective Taluka Municipal Association (TMA) Mirpurkhas, and EPA Mirpurkhas.

110. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor under the section 13 of Sindh Environment Protection Act 2014.

6. Noise and Vibration

a) Description

111. Sources of noise include improper silencing of vehicles and equipment used on the road construction site, aggregate crushing facilities as well as batch plants. These will impact on local communities and will be most pronounced close to or within urban areas.

112. Vibration will occur during compaction when vibratory rollers are used to compact subgrade materials. This is unlikely to cause permanent damage.

⁸ A detailed investigation by T. Townsend (1998) on the leaching characteristics of asphalt road waste found that such material was safe to use in any non-agricultural use setting, i.e. as soil material in fields, etc.

b) Mitigation Measures

113. The Contractor will need to ensure that; (i) machinery has installed working noise attenuation equipment such as sound mufflers, and (ii) machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities. Any aggregate crushing facilities within 500m of any residential or commercial areas will be required to install noise attenuation measures such as baffles or barriers 2 m high and located between the plant and the noise receptor. Noise will be measured as per Sindh Provincial and Pakistan National Environmental Quality Standards limits. Exceedances of these standards will require immediate noise reduction measures such as baffles and barriers.

7. Quarry /Borrow Material

a) Description

114. Transport of construction material (aggregate and fill) may raise environmental and social issues with the possibility of damage to bridges and pavements if vehicles are overloaded.
115. Borrow pits may cause problems such as damage to agricultural land or drainage, water ponding, loss of vegetation and crops. Problems may arise if the contractor extracts material from borrow areas without the permission of the Landowner.

b) Mitigation Measures

116. The Contractor will need to ensure that loaded trucks do not exceed bridge and pavement axle load specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected by the construction supervision consultant.
117. The contract documents shall require that the contractor obtains fill and other construction material from authorized/licensed quarry sites. Borrow material must be taken only with the consent of the land owner and if the contractor is found to be in violation, will be fined in addition to having to completely rehabilitate and re-vegetate the site(s).
118. The contractor will ensure that the use of productive and agriculture land and the loss of vegetation is minimised.

8. Contamination of Water Resources (Surface and Ground)

a) Description

119. Lubricants that enter the ground environment can render the area unusable and may pollute groundwater. Agriculture fields, aquatic systems, community owned stream channels and canals can be polluted by fuel and lubricants entering these systems.

120. Materials brought onto the site will generate a range of possible environmental pollutants for water resources. The main concerns will be from containers such as bitumen drums and plastic that may be brought on site as wrapping material if they are not properly disposed of.

121. During rehabilitation work on culverts and bridges the canals and water courses crossed the Mirwah to Naukot road, could become polluted by accidental discharge of cement and other chemicals like epoxy and paints.

b) Mitigation Measures

122. Fuel and oil storage areas should be located at least 250m away from any watercourses and be provided with a concrete platform and be bounded with interceptor traps so that any fuel leakage is retained within the site. Wash down water from machinery repair areas also needs to be directed into this system and held in retention areas for treatment. Refuelling should, wherever possible, be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. When the facility is no longer required the contractor will need to remove the structures and also excavate and remove any contaminated soil for disposal at an EPA approved site. New soil should be brought in as required so that the ground surface is re-established.

123. Asphalt should not be applied during heavy rain so as to avoid it being washed into watercourses.

124. Water channels must be diverted properly and a protection mechanism provided. Alternatively construction should be undertaken during the dry season.

125. Water channels will be monitored for their quality against “irrigation water quality standards” of Water and Power Development Authority, WAPDA. Ground water quality will be monitored against National Drinking water quality standards.

9. Damage / disturbance to Utilities Services

a) Description

126. Utility services within the RoW may include electrical cables, telephone lines and gas pipelines. It is possible that road widening and reconstruction will disturb/damage these.

b) Mitigation Measures

127. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.

10. Traffic Disturbance

a) Description

128. Construction work will require traffic to be diverted around areas, or delayed while work is being done.

b) Mitigation Measures

129. A traffic diversion plan will be developed by the contractor and approved by the Construction Supervision Consultant. Proper warning signs and flags will need to be displayed at the commencement of any road construction or diversion section so as to alert drivers to the changed road conditions. Old signage should be removed to reduce confusion, as soon as the work is done. This will be the responsibility of the Contractor.

11. Health and Safety Concerns

a) Description

130. Poorly constructed or maintained work camps can be unhygienic and affect worker health. Stagnant water that may remain in borrow pits and in discarded waste such as plastics, old tires and metal containers can create breeding habitats for mosquitoes and rodents.
131. While unlikely, because generally local people will be hired for the project, there is a possibility that concentrations of workers will result in the transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.
132. Accidents will inevitably happen, but are more likely if safety procedures and practices are not in place.
133. Secondly inadequate precautions during the handling of construction materials such as bagged cement, could lead to serious health problems among workers. Cement dust is very fine and highly corrosive to lung tissue and can lead to permanent damage if breathed in. Since much of the transfer of cement to the batch plant is still done by manual labour pouring the 30kg bags into hoppers, the risk to workers not wearing protective gear is high.

b) Mitigation Measures

134. Where possible, work camps shall be kept remote from settlements, however all camps shall be provided with septic sanitation facilities and potable water. A solid waste collection program must be established so that no garbage is left on the ground or let enter streams where it can affect downstream water quality, aquatic environments and human health.

135. Local labour will be actively sought out by the contractor, thereby reducing the need for work camps. Local labour can reduce social concerns as these people will return to their villages at night and act in accordance with accepted community norms.
136. The Contractor will need to have an effective Worker Health and Safety Plan that is supported by trained first aid personnel and emergency response facilities. Construction contracts will include standard Worker Health and Safety measures and contractors will be bound to implement these fully. This will include mandatory wearing of dust masks for any cement handling operations or at any area where cement dust is in the air.
137. Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed. Cement feed hopper areas will be inspected daily to insure compliance with the requirement of dust masks.

12. Interruption/ Contamination of Water channels

a) Description

138. There are thirty three watercourses crossing the project road: details were given in table 5. Repair or replacement of the crossing will often require temporary diversion of, or work within, the watercourse. This could affect the water supply to agriculture land of communities living nearby, and could lead to contamination.
139. Temporary traffic diversions disrupt and can be a danger to traffic.

b) Mitigation Measure

140. Where water crossings are being repaired. The water channel should be diverted or a protection mechanism provided to avoid contamination. Where possible, construction will be made in dry season.
141. The contractor should provide an adequate sized diversion so that there shall be no disturbance to water flows of canal /water course.
142. A traffic management plan shall be provided by the contractor. Signage and lighting may also be provided to reduce the likelihood of accidents.
143. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed

13. Burden on Local Resources

a) Description

144. A labour force that is not properly supplied with adequate rations or cooking/heating fuel will aggravate demands on local supplies of fuel wood and wildlife.

The project labour force can impose a burden on community water supply and sanitation systems.

b) Mitigation Measures

145. Where possible, local labour will be hired for the project so there will be no additional impact on natural and social resources and services. At all times workers must be supplied with the required daily rations or a living allowance as per their contract and at the same time contractors will be required to inform employees in writing about the consequences of illegal hunting, including the loss of a job and possible detention by local authorities.

14. Inadequate Camp Site Good Housekeeping

a) Description

146. While the use of local labour should minimise the need for on-site worker accommodation, there will nevertheless be a need for a work camp with office accommodation, catering, ablutions, prayer area, etc

b) Mitigation Measure

147. The contractor will be responsible for the construction, management the operation of the construction work camps to minimize the impact of construction activities on land; ensure adequate provision of waste disposal and health and safety of construction workers. The contractor will carry out the following activities to manage the disposal of construction waste.

- Train work force in storage and handling of materials
- Fire fighting
- Camp sewage will be treated in pit latrines or septic tanks which will be drained and sewage taken to a sewage treatment plant for processing. The treatment/management will be done according to the provision defined in the Pakistan EPA-specifications, which the contractor will have to become familiar with. Disposal will be recorded in a table and submitted as part of the semi-annual reporting to ADB.

148. Contractor will prepare as part of site specific EMP the following special sub-plans:.

- Traffic management plan-addressing construction related delays and a protocol for day-to-day management. Traffic management is also addressed in the contract specifications for the engineering works.
- Waste management plan specifying the treatment and disposal of garbage, sewage and oily waste at the contractor's camps and yards.
- Borrow site management plan –addressing preparation of access roads and decommissioning following use, of any borrow sites opened by the

contractor. Operating licensed facilities will not be included in this management plan, as they are already monitoring by the authorities.

149. The SSEMP, together with the sub-plans will be approved by the executing agency as well as the ADB, prior to the contractor mobilizing to the field

C. Operation Phase Impacts

150. Most of the impacts at the operation stage are positive and do not require mitigation. These include:

- Improved access to markets
- Reduced travel times
- Lower vehicle operating costs
- Reduced dust

151. However there are some negative impacts and these are listed in the following sections.

1. Lack of Environmental Safeguards

a) Description

152. While the proposed project will be completed with follow of environmental safeguards of the EMP. The contractor has to ensure the action taken during all stages with compliance of this EMP.

b) Mitigation Measure

153. The contractor, will provide mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released

2. Increased Traffic Volumes

a) Description

154. The Consultant's traffic forecast predicts an increase in traffic of up to 20% as a result of the road improvement. This brings with it increased noise and emissions, increased risks associated with the transport of materials and increased interaction with pedestrians and non-motorised transport.

b) Mitigation Measure

155. Traffic calming measures and speed limit signage will be provided to reduce the impact of the traffic through populated areas. Crossing areas will be marked and amber flashing lights installed in urban areas, when full traffic signals are not warranted.

3. Increased Risk of Accidents

a) Description

156. While the proposed road improvements will make the road safer in some respects, the increase in traffic and the potential for higher speeds may result in more road accidents especially in urban areas where there is a potentially dangerous mix of non-motorized, two, three and four-wheel traffic using the same carriageway.
157. The road design has had to balance the requirements of SPS 2009 to minimise displacement of encroachers and land acquisition against .road safety

b) Mitigation Measures

158. Improved traffic signage and road markings will be used to warn motorists of impending changes in road standards and to advise appropriate speeds
159. Properly designed traffic calming measures such as speed humps, speed signs and, possibly traffic signals will be installed within settlements.
160. Traffic police should be trained to more consistently enforce road rules.
161. One of the most effective ways of reducing deaths from road crashes is to reduce the time between the trauma occurring and hospital treatment. To this end an emergency ambulance provided by the local authorities would be the most effective. Failing that, better enforcement of the road rules and more stringent penalties should be sought.

V. GRIEVANCE REDRESS MECHANISM

A. Organisation

162. WSD will implement a three step grievance procedure for all project-affected people adjacent to the Mirwah to Naukot road. WSD will appoint a Grievance Resolution Officer (GRO) within its project management unit with the responsibility to ensure that the grievance redress procedures are known to the public and followed by the contractor.
163. A local grievance committee (GRC) will be constituted by the Works and Services Department (WSD). The GRC will consist of the GRO, Grievance Focal Person (GFP) who can be Community Leader, locally present NGO representative, the resettlement specialist or environment specialist from the WSD Environmental Safeguards Unit (depending on nature of grievance), one person from the revenue department and one or more co-opted members of the public. The GRC should include at least one woman.
164. WSD will ensure that the grievance procedure is accessible to all community members, including vulnerable people such as single mothers, the very poor, the elderly, and youth. Contact information, including contact addresses, emails, hotline numbers and websites will be posted at works site offices and on community notice boards in all towns. GRO will consult with appointed GFP prior to work commencing to inform them of the grievance procedure, relevant contacts and methods of resolution to maximise accessible to potentially affected persons through GFP.
165. Contact details will be distributed by the GRO to GFP in the appropriate local language, for posting in the village office.
166. To ensure women have access to the grievance mechanism, focus group discussions will be held to design protocols that are suited to their needs, including, access to the provincial ombudsman's office. Outreach programs will be tailored by GRC to women's needs to ensure information is communicated to them.

B. Procedure

167. The GRO will place a complaint register at an accessible location (Union Council office, Mosque, or at Camp Office) for respective community so anyone can register their complaint in this register and will check it on weekly basis.
168. The first step ([Figure 5](#)) on receiving a grievance will be for the GFP to refer the matter to the contractor, who will be given one week to respond to the grievance.
169. Any complaint that is not resolved directly will be referred to the GRC. The GRC will resolve the complaint within two weeks and inform the aggrieved party in writing the action taken against grievance.

170. If the complaint cannot be resolved at the GRC level, the issue will be referred to the director in charge of the Project Management Unit (PMU) if the grievance related to actions of the contractor or to the Provincial Ombudsman if the grievance relates to actions of WSD, the PMU or provincial government officers.

171. If the complaint still unresolved at the Provincial Ombudsman level, as the last step it may be taken at the national /provincial legal system. GRM shall take every possible effort to resolve the complaint at project level.

172. During loan implementation, all complaints received will be tracked and their resolution fully documented and reported to ADB by the PMU. The process will include the following elements:

- (i) Tracking forms and procedures for gathering information from the contractor/highway section and complainant(s);
- (ii) Updating the complaints database routinely;
- (iii) Identifying grievance patterns and causes, promoting transparency and information disclosure, and periodically evaluating the effectiveness of the grievance mechanism and environmental controls, and
- (iv) Collecting and submitting input for inclusion in progress reports for ADB.

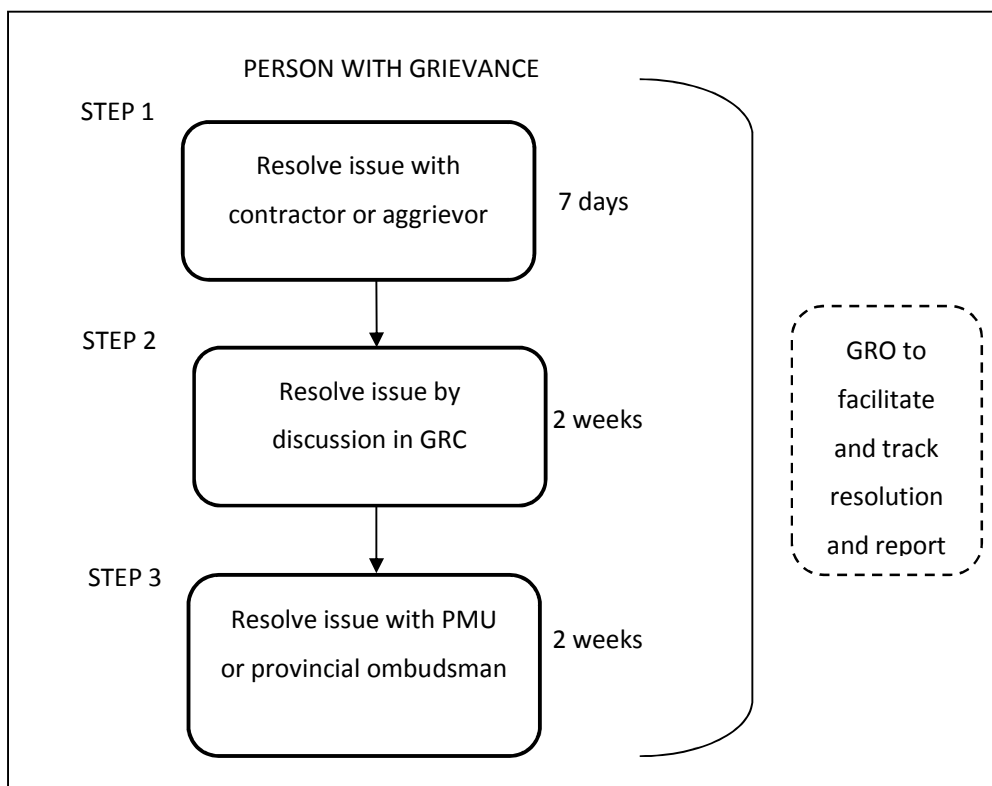


Figure 5. Steps of the Grievance Redress Process

VI. PUBLIC CONSULTATION

A. Objectives of Public Consultation

173. The overall objectives of the consultation process were as follows:
- To inform all interested people on the likely positive and negative effects of the road project and encourage feedback from stakeholders on IEE findings, principally the impacts and proposed mitigation measures;
 - To gain a consensus on the impacts identified, their importance and the relevance and effectiveness of the mitigation measures proposed;
 - To provide confidence that all relevant issues and mitigation measures have been identified, agreement that the mitigation measures are adequate, and that nothing significant has been missed;
 - To enable incorporation of stakeholder views and concerns in the IEE.

B. Consultation Process

1. Scope

174. The environmental consultants conducted meetings with local people, NGOs and government departments. The latter included the municipal administration, Forest Department, Livestock Department, Sindh Environment Protection Agency, and the Deputy Commissioner Mirpurkhas. During these meetings a description of the project (appropriate to the audience) was given, along with an overview of the project's likely social and environmental impact.

175. The interviews with the government representatives and NGOs were based on issues such as solid waste management, wastewater, forest, wildlife and archaeological sites whereas discussions with general public concentrated on their concerns relating to the project and likely impacts during the construction and operation phases. These included both environmental and concerns.

2. Community Consultations

176. Community consultations consisted of formal and informal meetings at Mirwah Gorchani, Umb Mori, Tando Jan Muhammad, Digri and Jhudo City. Meetings were conducted on dated 29th and 30th June 2014. The consultation exercise was conducted in both Sindhi and Urdu languages. A non-technical oral description of the project was given providing an overview of all likely positive and negative impacts. Following which, an open discussion was held so that the participants could voice their concerns and opinions. All participants were encouraged to voice their concerns and opinions. Participants were also asked to suggest alternatives where they had particular concerns.

177. Feedback obtained from the stakeholders was documented, and all issues and suggestions raised were recorded in survey forms. Both social and environmental issues were raised. The social issues are discussed in more detail in the Summary Poverty Reduction and Social Strategy report.

178. The people interviewed (Table 9) had only minor worries and generally agreed that most effects would be temporary only. Some common concerns regarding the shortage of electricity, potable and non-potable water, wastewater disposal, traffic congestion, poor roads, minimal employment opportunities, and security issues were raised. None of these issues related specifically to road reconstruction but were general complaints. All appreciated the project and said that it would boost the value of property, while some said that business, economic and employment situation in the area will also improve.

179. A matrix of concerns raised by community members was prepared ([Table 8](#)). The register of attendance is provided as [Table 9](#). Other people joined the discussions but declined to be identified. A pictorial record of the meetings is included as Annex -2. Note that residents in Mirpurkhas were asked about both the Mirwah Naukot and Sanghar _Mirpurkhas roads. Where relevant, their comments will be included in both IEE.

Table 8: Summary of Concerns Raised During Stakeholder Consultations

Issues	Concerns raised by community	Remarks
Road design	Storm drainage should be provided Mirwah Gorchani, Umb Mori, Tando Jan Muhammad, Digri and Jhudo City Road must accommodate the heavy traffic of the sugar cane and cotton seasons	Drainage channels are proposed un all urban areas Seasonal traffic has been taken into account.
Interaction / Conflict with local community	Immigrant workers may be of different backgrounds and culture or they may involve in the illegal activities in the area and conflict between the community and worker may occur	Immigrant workers should be well scrutinized before their deployment in the project area.
Employment	Provision of semi-skilled and unskilled jobs for local labour.	Unskilled jobs will be given to locals people where possible. Training will be provided
Livelihood	Restriction of livestock grazing and accident killing of livestock and local residents. measure should be taken minimize the business loss in the urban area during the construction activity	Grazing areas should be protected and speed of vehicles will be limited to avoid accidents. The land use and resettlement plan addresses disturbance during construction
Safety of Community	Speed Restrictions, Traffic police may be deployed Flagmen need to be in place for traffic control, which is thought particularly important for the towns located along the roadside.	International Safety Standards for the road safety and community safety shall be adopted and maintained.
Medical Facility	Unavailability of Medical Facility	Reconstructed road will improve access to existing facilities
Dust, loss of trees and agricultural land	Existing damaged road creates lot of dust Trees and farmlands near the RoW should be protected leftover construction material shall be collected at completion of the activity	Dust will be reduced when road has been re-constructed Disturbance to trees and farmland will be minimal
Other issues	Minimizing the construction duration Road should be rehabilitated as early as possible Traffic congestion due to damaged road Travel time is increased due to damaged road	Construction will be programmed to minimise the length of disruption at any one point These issues will be addressed once road constructed

180. As appropriate these concerns have been incorporated into the EMP items and have been related to the appropriate WSD officers. They should be taken up by the safeguard specialist when appointed.

Table 9 General Public Interviewed During Public Consultation in relation to the Mirwah to Naukot Road

Name	Town/Village	Position /Occupation
Mr. Agha Rustam Khan	Mirwah Gorchani	Village leader
Mr. Muhammad Iqbal	Mirwah Gorchani	Tea shop
Mr. Shoib Ali Gorchani	Mirwah Gorchani	Student
Mr. Faraz Ali Gorchani	Mirwah Gorchani	Villager
Mr. Mukhtar Ahmed Memon	Mirwah Gorchani	Villager
Mr. Rasool Bux	Mirwah Gorchani	Farmer
Mr. Tariq Aziz	Mirwah Gorchani	Farmer
Mr. Rajab Ali Kaloi	Digri /UMB Mori	Villager
Mr. Yar Muhammad Kaloi	Digri /UMB Mori	Villager
Mr. Yasin Kaloi	Digri /UMB Mori	Farmer
Mr. Devshi	Digri /UMB Mori	Famer
Mr. Khalid Hussain	Digri /UMB Mori	Tyre Shop owner
Mr. Jalaludin Abring	Digri /UMB Mori	Worker
Mr. Muhammad Asif	Digri /UMB Mori	Farmer
Mr. Muhammad Ashraf	Tando Jan Muhammad	Private Job
Mr. Mohsin Ali	Tando Jan Muhammad	Private Job
Mr. Aijaz Ali	Tando Jan Muhammad	Private Job
Mr. Zulfiqar Ali Khaskheli	Jhudo City	Manager at Filling station
Mr. Amanullah Mahar	Jhudo City	Private Job
Mr. Irfan Ali	Jhudo City	Private Job
Mr. Habibullah	Jhudo City	Labor

3. Government Agencies

181. Stakeholders including local government and provincial government officials, local and international NGOs, and related stakeholders were consulted at their offices ([Table 10](#)). All the stakeholders were given maximum project information and were shown a detailed map of the area. Their concerns and suggestions are reproduced below.

Attendance lists of the stakeholders from the four communities consulted in the subproject was collated and reproduced in Table 9. Pictures of the meetings are provided in Annex-2. Note that the Government offices at Mirpurkhas (Mirwah-Naukot) have jurisdiction over Sanghar Mirpurkhas project road. Hence some consultation comments will be repeated between IEE.

a) District Commissioner Mirpurkhas

182. A meeting for consultation with stakeholder was held with, District Commissioner Mirpurkhas, Mr. Usman Mehsood who is also heading the TMA of Mirpurkhas on dated 26.06.2014. He raised the following points after welcoming the proposed project activity in his area of jurisdiction. The meeting was held at DC Office Mirpurkhas. Their views are as under:

- He mentioned that with proposed project road economic activity will increase in the area, job creation opportunities will increase, Farm to market access of the area will be easy.
- He mentioned that there is no landfill site in the Mirpurkhas. Waste generated from the city is being dumped trenches.
- He also mentioned that wastewater generated from the city is being dumped in the seepage drains. There is no wastewater treatment plant in the city.
- He suggested that ADB shall also bring projects for the Mirpurkhas city in the area of Municipal solid waste management, Wastewater treatment and Drinking water supply.

b) Livestock Department Mirpurkhas

183. A meeting for consultation was held with official (Mr. Atif Qaimkhani Clerk) of the Livestock department Mirpurkhas on dated 27.06.2014 He raised the following points after convivial the proposed project activity in the area. The meeting was held at Livestock Department Mirpurkhas. Their views are as under:

- He had appreciated the proposed project activity, and mentioned it will be helpful for the local livestock and dairy farming industry, Farm to Market access will be better, and this will reduce the travel time and cost.
- Local agriculture industry will get boost, jobs will be available for the locals

c) Environment Protection Agency Sindh (Mirpurkhas Regional Office)

184. The Mirpurkhas office of the Sindh EPA is responsible for general environment protection in the project area. A meeting was held with the Deputy Director Mr. Shoib Rajput and his clerical staff on dated 27.06.2014. The main points are as follows:

- In general, the participants approved of the project and were of the opinion that there is dire need of this kind of project as the recent floods had badly damaged this road.
- A tree inventory shall be made before start of work, and tree plantation shall be carried out as per ADB Policy and local laws. A budget shall be kept for this purpose and specified in the BOQ and contract documents.
- Jobs shall be provided for locals during construction and operation phase
- Contractor shall dispose the hazardous waste through EPA certified contractors.
- Due to unavailability of Safe drinking water Hepatitis C is spreading in the region.

- There is no proper landfill site in the project area (Mirpurkhas and Sanghar) A dumping site for any non-hazardous waste will be indicated to the contractor jointly by the EPA Office and local TMA.
- Currently 75% of solid waste is left unattended. The leftover material is being openly burnt which is causing health issues.

d) District Forest Office Mirpurkhas

185. A consultation meeting was held with Mr. Shahzad Saddiq Gill District Forest Officer (DFO Mirpurkhas), Mr. Abdul Rasheed Range Officer Mirpurkhas, on dated 25.06.2014 to discuss environmental issues related to the proposed project. The consultant team provided information about the proposed project with the help of the project area map and requested the officers to identify any protected forest or other concerns of the Department. A set questionnaire was also filled during the meeting. During the meeting the DFO expressed some reservation regarding the project. Their views and answers are re-produced as follows.

- He appreciated the project activities; and thought this kind of project will increase the employment opportunities in the area and increase business opportunities.
- He also said that this project will reduce the travel time, and energy of locals as the current road condition is poor.
- He also said this kind of project will help to shift the demand of wood, when people of the area get the gas they will not burn wood as fuel.
- He said the reserved forest of the area should not be disturbed at all and he mentioned that Khipro Forest is the only protected forest of the area.
- The Range Officer mentioned that the Forest Department has planted some 865 cornucopias trees of along the project road. They should be protected, or if cutting is unavoidable, re planting shall be carried out as per local law.

4. Non-Government Organizations

186. After the 2010 floods, various NGOs were established with local and foreign funding to participate in the relief works. Some of these NGOs are still involved in various projects related to social and environment development and were consulted for this project on dated 27.06.2014. Mr. Muhammad Hussain from the NGO HANDS made the following comments and suggestions;

- As roads are vital for communication during the any emergency; this project should be started as soon as possible.
- Better road conditions will reduce the rate of accidents around the sugar mills
- Road works should be sprayed with water to avoid dust generation in the urban and rural areas during construction.

C. List of Public and NGO Sector Stakeholders Consulted

187. A number of stakeholders, other than the general public, who are likely to benefitted or be involved during the project execution phase, were also consulted ([Table 10](#)).

Table 10 List of Stakeholders Consulted for Mirwah to Naukot road

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr. Shoib Rajput	Provincial Government	Deputy Director EPA Sindh

Name of Stakeholder Representative	Type of Stakeholder	Department / Occupation/ Designation
Mr Shehzad Saddiq Gil	Provincial Government	Divisional Forest Officer Mirpurkhas
Mr. Gul Junejo	Provincial Government	Divisional Forest Officer Sanghar
Mr Abdul Rasheed	Provincial Government	Range Forest Officer Mirpurkhas
Mr. Dedar Hussain Baloch	District Government	District Municipal Administration Sanghar
Mr. Lal Khan	District Government	Acting Taluka Municipal Officer
Mr. Muhammad Hussain	NGO	HANDS (NGO)

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Objectives of Environmental Management Plan

188. The purpose of the environmental management plan (EMP) is to provide a summary of the predicted impacts associated mitigative measures and monitoring actions so as to minimize potential negative impacts and enhance positive impacts from the Project. The EMP will provide a guide (almost checklist) for the main stakeholders, namely the owner, contractor and operator of the road, on what mitigative actions need to be taken and where and when they are needed. It will thus help to improve the likelihood that adverse impacts are mitigated, project benefits are showcased, and an environmentally beneficial standards of best practice is provided to all those involved. In particular, the EMP:

- Defines roles and responsibilities for those involved in the implementation of the EMP and identifies areas where these roles and responsibilities can be shared with other stakeholders
- Provides concise instructions to project personnel and contractors regarding procedures for protecting the environment and minimizing environmental impact, making these legally binding through their inclusion in contract specifications
- Defines the requirements for communication, documentation, training, management and implementation of the mitigative measures; and,
- Specifies actions required to assess compliance with and effectiveness of the mitigation measures through a compliance and effects-monitoring mechanism, defined in the EMP's two action tables.

B. Environmental Management Plan for Mirwah to Naukot Road

189. The EMP, mitigation and monitoring tables for the Mirwah to Naukot road is included as Annex 1 to this report. It will be included in the contract documents in its entirety as an environmental clause, referenced as a mandatory exercise or integrated into the contract specifications as specific clauses. The estimated costs ([Table 11](#)) will be used to prepare a specific environmental safeguards section in the construction Bill Of Quantities, thus enabling the Construction Supervision Consultant to pay only as environmental tasks are completed and complied with.

190. The EMP will be revised if project design and construction parameters are changed significantly, then updated during the pre-construction stage of the project.

1. Preconstruction Phase

191. The pre-construction period is the time when road planners can influence the road design and work, thereby avoiding or reducing to an acceptable level any potential negative impacts. The value of the environmental assessment process can be undermined if this IEE and its EMP are not shared with or adopted by relevant parties during the design and bidding stages. A number of common issues and solutions are described in the EMP.

192. In line with ADB SPS (2009), impacts and risks have been identified in the context of the project's corridor of impact. For rehabilitation projects, this impact corridor is the road RoW (20m-25m), any haul routes established for the work, and any temporary storage areas, usually located within the RoW. All construction materials will be purchased from fully licensed suppliers, who are assumed to be operating in an environmentally acceptable manner as defined by the national and provincial EPAs.

193. The EMP's mitigation (EmiT) and monitoring (EmoT) tables (Annex 1) identify eight important actions to be undertaken by the Sindh Works Department and the

Construction Supervision Consultant, including a task to brief the selected maintenance staff of the WDS and any contractors on the EMP and the actions to be undertaken.

194. A Site specific EMP (SSEMP) is to be prepared by the contractor based on the generic EMP provided in the IEE. The SSEPM will perform a risk assessment of all mitigation options and will propose site specific mitigation options that would be appropriate and commensurate with the actual impact. The contractor will not be able to start the construction works before the approval of SSEPM from PMU and final approval from ADB.
195. All environmental assessment documentation shall be prepared and approved during the preconstruction period, translated into the local language and distributed to all stakeholders, namely the local works department, the contractor(s), any monitoring agency and local government managers, for use in implementation of the environmental management actions.. By knowing where and what environmentally sensitive receptors exist, and what issues are likely to arise in the future, Sindh Works and Services Department will be able to avoid serious impacts by modifying designs, adjusting alignments or switching to more sustainable methods and/or materials.
196. Sindh WSD will provide a briefing to contractors on the contract and implementation requirements of the EMP.

2. Construction Phase

197. A major factor that can lead to the failure to implement an EMP is lack of qualified environmental experts with the contractors, and therefore (often total) lack of understanding of the EMP and good environmental management practice. An extensive training plan for the Contractor and PWD is being incorporated which need to be implemented. This should help to address this problem. Using the EMP, the contractor will prepare an Environmental Management Work Schedule (EMWS) placing all measures defined in the general EMP in a time bound schedule. It will identify mitigation and monitoring actions required in relation to particular construction activities. The contractor, with advice from the Environment and Social Unit (ESU) (a section within the PMU) will be mainly responsible for implementing the EMP.
198. There are eleven Construction phase EMP actions focusing mostly on contractor activities, the management of worksites and contractors' equipment and people. Specifically this part of the EMP focuses in defining ways to minimize effects such as dust generation, emission from vehicles and air quality, disposal of spoil and solid waste, noise and vibration from construction machinery, quarry and borrow material transport and disposal, contamination of surface and groundwater resources and work camp management.

3. Operating Phase

199. Operation period actions focus on confirming that the contractor completed the EMP tasks required and that the operation of the improved road does not aggravate existing problems such as roadside safety. All the work proposed is on existing roads and confined to the existing RoW. There will be some increase in the speed and volume of traffic, raising potential road safety issues (e.g. Q1 and 2). Speed limits will be monitored through traffic police as discussed earlier.
200. Most of the impacts are positive due to better road conditions which do not require any mitigation measures such as:
- Less travelling time
 - Quicker access to Market

- Fuel efficiency
- Less dust generation
- Safer journeys

C. Cost Estimates

201. The cost of implementation of the environmental safeguards includes both the direct cost of the mitigation measures and the costs of monitoring the execution of the EMP such as laboratory costs and monitoring visits, training costs, etc. Table 11 shows the cost to be included in the BOQ items by the contractor.

Table 11 EMP Implementation and monitoring estimated cost for Contractor

Items	Unit Cost	No of Units	Estimated 1 st year	Estimated 2 nd Year	Total (Rs)
Training (Different trainings for 193 persons)		193	981,000	981,000	1962,000
Generators & Construction Machinery Noise Monitoring	7000	90	7560000	7560000	15120000
Drinking Water Quality Monitoring (During Const)	10000	12	120,000	120,000	240,000
Workers Communicable Disease Screening Test	8000	193	1544000	-----	1544000
Personal Protective Equipments (for 200 persons approx) replacing every year)		210	1305500	1305500	2611000
Fire Fighting Equipments purchase and refilling		30	250,000	100,000	350,000
Health & Hygiene	--	--	741360	741360	1482720
Canal Monitoring (Pre-Const, During Const,) monthly basis 1 month for pre-cons + 24 month of Construction	4,000	33	1,584,000	1,584,000	3,168,000
Ambient Air Monitoring (Pre-Const, During Const,) Three Places (Two towns + Asphalt plant) on monthly basis	27000	36	972,000	972,000	1944,000
Noise Monitoring (Pre-Const, During Const,) monthly basis at 15 sensitive locations	750	20	180,000	180,000	360,000
Environmental Officer Salary	150,000	1	1800,000	1800,000	3600,000
Subtotal					32,021,720
Contingency Cost 10%					32,021,72
Total					35,223,892

D. INSTITUTIONAL CAPACITY NEEDS, PROPOSED STRENGTHENING AND IMPLEMENTATION ARRANGEMENTS

1. Technical Capacity Building

202. The Sindh provincial road improvement project will be coordinated by the Works and Services Department as an executing agency (EA) with a project management unit (PMU) established within WSD as Implementation Agency. The PMU will be self-sufficient to monitor the environment related issues.

203. A dedicated Environment and Social unit (ESU) will be established within the PMU. Unit will be headed by the PMU Project Director and will have the two qualified environmental specialists. One for the upper Sindh Area roads, and other for Lower Sindh region roads. Both will monitor the environment related issues and monitor the Contractor and consultant progress and report the Project Director WSD and ADB.

2. Implementation Arrangements

204. The Project Management consultant (PMC) will support all Deputy Directors and PMU for project development. The PMC's environment experts will support the ESU in ensuring that project roads comply with ADB's SPS (2009), PEPA 1997 and S-EPA 2014 ([Table 12.](#))

Table 12 Implementation Organisation for Road Reconstruction and Rehabilitation

Role	Body
Executing Agency (EA)	Works and Services Department Sindh
Implementation Agency (IA)	Works and Services Department, Project Management Unit
Design Consultants	To be appointed
Project Management Consultants	To be appointed
IEE Environment Consultants	Engineering Consultants International ECIL
Social Consultants	Environment Management Consultants (EMC)
Technical and Financial Support	Asian Development Bank

205. The ESU will, with assistance from of the PMC environmental specialist:

- Prepare environmental screening checklists;
- Ensure that the EMPs, including all proposed mitigation measures and monitoring programs are properly implemented by the contractor.
- Ensure the health and safety of workers, and community guidelines are being followed by the contractor.
- Share information and disclosure of environmental safeguard documents (including any Corrective Action Plans prepared in cases of change to original project design) as required.
- Carry out visits to construction sites, work camps, quarries and borrow pits to review the environmental performance of the contractors;
- Ensure that the required environmental training is provided to the staff concerned;

206. Contractor will hire one full time person to address the environment safeguards; Environmental Engineer's responsibilities will include;

- Prepare Site-specific EMP consistent with the EMP of this road.
- Monitor the work and undertaken the monthly reporting.

- Carryout site visits of construction camp, construction site(s), quarries and borrow pits to review environmental status and rectify the non-compliances.
 - Supervise the environmental monitoring is being carried out as pre-defined frequencies mentioned in EMP
 - Coordinate with PMU Environment specialist to conduct site visits.
 - Impart trainings as per schedule.
 - Prepare monthly environmental monitoring report
 - Conduct day to day Site inspection activities for any non-compliance
 - Conduct environmental monitoring activities through certified environmental laboratory.
207. ADB's responsibility will be to review IEEs as a basis for the approval of the subproject.

3. Monitoring and Reporting

208. The monitoring and reporting frequencies and responsibilities are as follows;

a) Implementing Agency

- PMU will develop the monthly compliance monitoring checklist and brief to Environment Engineer of the Contractor.
- Carryout field visits for HSE compliance monitoring on quarterly basis
- Submit a bi-annual monitoring report to ADB commencing from when the contractor is mobilized.

b) Project Management Consultants

- Ensure the compliance monitoring is undertaken as required.
- Conduct the monthly review meeting with the Contractor to address any issue arising.

c) Contractor

- Contractor Environment Engineer will be required to submit monthly checklists to the Implementing Agency duly reviewed by PMC, identifying what mitigative actions have been undertaken.
- Conduct the Environmental Monitoring (Ambient Air, Drinking water, Canal Water, Noise (ambient noise and equipment noise) as per frequencies and parameters mentioned in (Table 13).

Table 13 Monitoring and reporting frequencies

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
1.	Environmental monitoring plan for Canal Water Monitoring						
a	Pre-Construction	Forty two water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Once	WSD	PMU
b	Construction	Thirty three water crossings	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Monthly	Contractor Environment Engineer	Supervision Consultant

S.No	Time frame	Location	Category / Equipment	Parameters to be Monitored	Reporting Frequency	Implementer Responsibility	Supervision
2. Environmental monitoring plan for Drinking Water							
a	During Construction	Campsite	Biological Parameters	E-Coli, fecal coli form, Total Coli form	Quarterly	Contractor Environment Engineer	Supervision Consultant
b	During Construction	Campsite	Physical Parameters	pH, Color, Turbidity, TDs, Total Hardness	Quarterly	Contractor Environment Engineer	Supervision Consultant
c	During Construction	Campsite	Chemical Parameters	Chloride, Fluoride, Nitrate, Nitrite, Pb, Zn.	Quarterly	Contractor Environment Engineer	Supervision Consultant
3. Environmental monitoring plan for Ambient Noise							
a	Pre-Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Once	WSD	PMU
b	During Construction	15 sensitive locations (School Hospital Residential Areas)	Ambient Noise	dBA	Monthly	Contractor Environment Engineer	Supervision Consultant
4. Environmental monitoring plan for Air Emission							
a	During Construction	Campsite	Construction Machinery & Generators	CO/CO ₂ , SO ₂ , NO _x , PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant
5. Environmental monitoring plan for Ambient Air							
a	Pre-Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Once	WSD	PMU
b	Construction	Three towns along road and One at Campsite	Ambient air	SO _x , NO, NO _x , CO, PM ₁₀	Monthly	Contractor Environment Engineer	Supervision Consultant

d) ADB

- Review the biannual monitoring report and follow up all outstanding issues.
- Approve any proposed changes to the management plans or procedures

VIII. CONCLUSIONS AND RECOMMENDATIONS

A. Principal Findings

209. This IEE is one of six been prepared for the Provincial Road Improvement Project of Government of Sindh Works and Services department. This IEE is in respect of the Mirwah to Naukot road.
210. The proposed rehabilitation/reconstruction of the Mirwah to Naukot road will have very little environmental impact. The work will be constrained within the current right of way and thus there will be no significant impact on adjoining lands, cultural sites or on fauna or flora. The environmental category is 'B'. There is a minimal requirement for resettlement of illegal encroachers; this is being addressed in a separate LARP.
211. The following are the main issues identified and concerns raised during the study:
- The project is in predominantly bad condition and travelling time is around double the time that would be expected for a road in good condition;
 - The road embankment is eroded in some places;
 - There are mosques, graveyards and shrines built adjacent to the ROW of the project road no cultural or sensitive structure will be affected.;
 - There are major and minor canals and waterways crossing the road, requiring special care during construction works
 - There is only one designated forest in District Sanghar, Khipro Forest. This is far from the project road and will be unaffected.

B. Conclusion

212. The improvement of the Mirwah to Naukot road, part of the Provincial Road Improvement Project of the Government of Sindh, is limited to road reconstruction within the existing right of way. It is therefore likely to have only limited impact of a temporary nature and short duration. The impacts can be mitigated with the measures proposed in the Environmental Management Plan.
213. Provided the EMP is followed, there should be no damage to cultural and archaeological sites. Trees located on the embankments will not be disturbed. The environmental safeguards will have to be monitored by concerned agencies, including Contractor, Environment Specialist ES (PMC) and PMU-W&S Department. Due diligence, with mandatory coordination among various stakeholders, will further ensure mitigation of any adverse impacts.
214. This IEE study concludes that the proposed pilot road project will not lead to significant adverse environmental and social impacts of such nature or magnitude that would require a more detailed report in the form of an EIA. Additionally careful implementation of the EMP will ensure that environmental impacts are managed and minimized and the project proponent meets all statutory requirements.
215. The project has been discussed with local people, government officials and NGO. The consultations elicited general support for the project. There were no serious environmental issues raised or matters that the Consultant had overlooked. The main concerns expressed were to ensure that local people got employment on the project and that measures were in place to avoid excessive noise or dust. There was also a concern about safety, especially during construction, but generally a view that improved road conditions would improve safety.

C. Recommendations

216. A schedule of activities associated with reconstruction has been prepared and the potential environmental impacts of each activity assessed. For each activity, recommended mitigation and monitoring actions have been identified. These are covered in the Environmental Management Plan. All impacts are minor and able to be mitigated.
217. The following recommendations are carried over from the text:
- Environmental monitoring shall be carried out by the IA and contractor in compliance with the EMP to minimise damages to the environment, workers or the community. This will be enforced through contract specifications and an environmental BoQ section.
 - The contractor will ensure that borrow material /earth-fill will be obtained from the approved sites.
 - Trees located on the embankments will not be disturbed.
 - Asphalt plant shall be located at least two kilometres from settlements
 - Construction camps will be located a minimum of 1000m from existing settlements, built-up areas and at least 500m from canals.
 - Excavation of earth fill will be limited to an appropriate depth of 20cm.
 - Canals and other water resources will be closely monitored to ensure no contamination occurs due to project related activities
 - A dust abatement program will be implemented that includes spraying water on roads and work areas within villages and past houses adjacent to the road.
 - Health and safety plans will be prepared.
 - Construction work shall not hinder local people's access to nearby facilities.
 - SSEMP will be developed by the contractor which needs to be reviewed by the PMC, approved by IA and final approval is required from ADB. Contractor will not be able to start the construction till the SSEMP is not approved.
 - An emergency and safety plan will be developed by the contractor/PMU for bridges and roads near canals and waterways.
 - A grievance redress mechanism will be implemented by the contractor to ensure that community complains are addressed and recorded.

Annex 1

Table 14 Environmental Management Plan: Environmental Mitigation Table (EmiT) and Environmental Monitoring Table (EmoT)

Environmental Management Plan (EMP):Environmental Mitigation Table (EmiT)

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1. Pre-Construction Period Impacts					
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	A PMU will be established prior to loan effectiveness, with training completed during detailed design. Contractor training, and environmental briefing will be conducted prior to mobilization.	Head office WSD	WSD	WSD
1.2. Consideration of IEE/EMP in preparation of the detailed design and bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the boundaries defined in the EMP.	Before the tendering	NA	WSD	Supervision Consultant
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Design and implementation planning for Mirwah to Naukot road	At any locations where mature trees will be cut down.	WSD	PMU

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
1.4. Top Soil Erosion	Sindh WSD will prepare an earthworks checklist that defines for the contractor, limits to the excavation during the road rehabilitation. Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is completed. Use of soil from private land will be minimized and only after consultation with and compensation of landowners.	During Planning phase, in parallel with the preparation of bid documents	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
1.5. Disturbance to Archaeological and Cultural Sites	No cultural or archaeological sites have been identified in the Mirwah to Naukot road and thus no mitigation measures are required.	----	---	----	-----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption	Prior to contractor mobilization	NA	WSD	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	Rehabilitation work will result in access from a business and residence to the road being cut off or limited at times. To prepare for this inconvenience, WSD will define a roadwork information exchange procedure requiring the contractor to contact roadside landowners of the work, the period of access restriction and the measures taken to allow movement around the construction work.	Completed prior to contractor mobilization and provided the contractor as part of the contract documentation	NA	WSD	Supervision Consultant
1.8. Contractor's Environmental	Unfortunately contractors have a very poor record with complying with	Plan to be provided the	WSD	WSD	Supervision

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
Safeguards Capacity	workplace and environmental safety regulations. To address this WSD will require the contractor to define a Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, and use of Personal Safety Equipment	Consulting Engineer and PMU prior to start of work			Consultant
2. Construction Period Impacts					
2.1 Dust Generation Transportation of Material					
A small increase in particulate matter (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<ul style="list-style-type: none"> i. The Contractor will be required spray water on unsealed roads and work areas within villages and past houses located close to the road and giving priority to sealing in urban areas. ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas. 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	<ul style="list-style-type: none"> i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system. ii. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted 	Throughout the construction period	Anywhere where there is material moved, earthworks cutting and filling.	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	During Construction	At any locations where borrow pits, quarries will be operated.	WSD	Supervision Consultant
218. 2.4 Increase in air pollution from vehicular and machinery exhaust	<p>Emissions will be minimised by:</p> <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly maintained according to manufacturer's specifications; ii. use of appropriate octane fuel and haul loads within specified limits. iii. Vehicle idling time limits to no more than 2 minutes, iv. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent 	During Construction	Construction Site	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	excessive TPM pollution.				
2.5 Disposal of Spoil and Solid Waste					
i. asphalt layers and base materials of the existing road	i It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	During Construction	All Construction Sites	Contractor	Supervision Consultant
ii. Unused construction material (sand, crush), empty drums, concrete waste and waste from work camps.	<p>i The contractor will identify dumping locations for construction debris and non-hazardous solid waste with r TMA Mirpurkhas, and EPA Mirpurkhas.</p> <p>ii The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii The cost of disposal of hazardous and non-hazardous waste shall be included in the Contractors BOQ.</p>	During Construction	All Construction Sites	Contractor	Supervision Consultant
2.6 Noise & Vibration					
i. Noise and Vibrations associated with earthworks and haul	i Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust	During Construction	Construction areas	Contractor EHS	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
roads.	<ul style="list-style-type: none"> settling at least on road for 500m on either side of a village. ii Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800. iii Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between contractor and local communities. 	period		Inspector	
ii. Excessive Noise at sensitive sites	At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Throughout construction period, at least every month, using a portable sound pressure meter.	As listed in IEE: Schools, residential areas ,Mosques and health care facilities along the road side, and as identified in the IEE.	Contractor EHS Inspector	Supervising Consultant
2.7 Quarry/Borrow Materials					
i. Overloading of trucks, may damage pavement, bridges, and culverts	i. The Contractor will ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Throughout construction period	Construction sites	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Any need for borrow material outside of the RoW will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Construction Period	Along any stretches where road will be raised and fill is needed, particularly in areas with long visual distances	Contractor EHS Inspector	Supervising Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Construction Period			
2.8 Contamination of Water Resources (Surface& Ground)					
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works.	<p>i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected.</p> <p>ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will</p>	Throughout the construction period	Based on an analysis of soil conditions by contractor /and consultant hydrology and geotechnical expertise	Contractor	Supervision Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>be monitored upstream and downstream of the road before, during and after the work has been completed on that crossing.</p> <p>iv. Water channels have to be diverted properly, protection arrangements should be provided at each culvert / water crossing</p>				
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	<p>Before the start of construction work.</p> <p>Design phase.</p>	Where utilities services located	Contractor EHS Inspector	Supervising Consultant
2.10 Traffic Disturbance					
Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	Construction Period	Town Crossings Canal Crossings	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
2.11 Health and Safety Concerns					
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor must provide protective masks to milling machine operators, and anyone working in the area of the milling machine dust-cement hopper area, with masks of a micron size, capable of capturing dust down to 2 microns.</p> <p>iii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn and contractor should provide basic training on use of protective clothing and equipment.</p> <p>v. All Construction labour and staff of the contractor and consultant will be tested for the communicable disease (STD &STI).</p>	Construction period	Construction Camps, Construction sites and Asphalt Plant area	Contractor EHS Officer	IA
2.12 Interruption /Contamination of Water channels					
	<p>i. Contractor should provide the adequate sized diversion, so that there shall be no</p>	Construction period	Culverts and bridges	Contractor EHS Officer	IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>disturbance to water flows of canal /water course.</p> <p>ii. Protection mechanisim should be provided to avoid contamination.</p> <p>iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents.</p> <p>iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed</p>				
2.13 Over Used Local Resources					
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Construction period	Construction Camps, Work site and Asphalt Plant area	Contractor EHS Officer	IA
219. 2.14 Contractor Good Housekeeping Practices not Applied					
	<p>i. All camps shall be provided with septic sanitation facilities and potable water.</p> <p>ii. A solid waste collection</p>	Throughout the construction period	All construction camps , work areas and contractor	Contractor EHS Inspector	Supervising Consultant

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	<p>iii. program must be established Monitoring will be required for the solid waste disposal at camp site and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>		'yards'		
3. Operating Period					
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract and submit that to the PMU before the final payment can be released	1 month before the end of the construction period	NA	WSD & Contractor	WSD
220. 3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	Operation period	All nearby Towns	Traffic Police	-
3.3 Increased Risk of Accident and Injury	Appropriate traffic calming and signage will be installed for the driver, speed	Operation period	As per design	Contractor and Traffic	ES/PMU /IA

Environmental Issue	Mitigation Measure	Time frame	Location	Implementer	Supervisor
	limits shall be monitored by the traffic police to avoid any accident and subsequent spillage. An emergency service may be provided by the local authorities.			police	

A. Compliance Monitoring

1. Works and Services Department (WSD) and the Supervising Consultant and to a lesser extent the contractor shall be responsible for the implementation of the Environmental Monitoring measures specified in the Environmental Monitoring Table (EMoT). During the construction period monthly safeguard monitoring checklists and observations on air, noise and water quality will be presented in a tabular monitoring reports and submitted to the Implementation Agency ES- PMU,. Monitoring reports and notes to file shall be prepared as per the frequency mentioned in the EMoT and shall be assembled by the PMU and its construction supervision consultant into semi-annual monitoring reports, as mandatory submissions to ADB. Noise measurements will be obtained via a portable noise meter to be used by the contractor and/or the PMU's safeguard specialist or the Supervising Consultant's environmental specialist.

Environmental Management Plan (EMP): Environmental Monitoring Table (EMoT)

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1. Pre-Construction Period Impacts						
1.1. Lack of environmental technical capacity within WSD and its PMU in environmental assessment and design, management, supervision and reporting.	WSD will establish a unit, or at least a person within the PMU, to manage environmental, social and safety aspects of maintenance projects. The PMU will be staffed by at least one full-time suitably qualified Environment Specialist, who will ensure that environmental safeguard measures associated with this and other projects are credibly implemented, including provision of necessary training to WSD road maintenance staff.	Confirm that WSD and Contractor training is carried out during the relevant timescales.	At least 1 month before construction begins Within the 1 st month construction begins.	Environment person working within PMY	PMU	WSD
1.2. Lack of integration of IEE/EMP requirements into construction bid documents.	PMU will check that design and bid documents are responsive to key environmental, social and safety considerations, and that the proposed method of work reflects the environmental boundaries defined in the EMP.	Confirm that bid documents, contracts and have specific environmental items or there is a specific reference to the EMP	Before the tendering and before contract finalized	Date and time that confirmation completed filed with PMU	PMU-monitor	PMU or Supervision Consultant (if available)
1.3. Loss of Vegetation and trees	During detailed design the supervising engineer/consultant will modify the design on order to minimize the removal of mature trees from roadsides; carriage	Monitor to obtain copy of plan and record compliance—for presentation in smi-annual audit report	Prior to start of construction	Date and time that confirmation completed recorded & filed with PMU	PMU-monitor	PMU

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
1.4. Top Soil Erosion	<p>Sindh Works will prepare an earthworks checklist that will define, for the contractor, limits to the excavation during the road rehabilitation.</p> <p>Instructions for topsoil management will also be defined, including the removal and storage of all topsoil to be used in landscaping, once the road work is done</p> <p>Encroachment on private land will be minimized and only after consultation with landowners and and compensation of losses Land owners will be compensated This will be monitored through ES- PMU</p>	Monitor checks that topsoil management steps prepared and ready for implementation	During Planning phase, in parallel with the preparation of bid documents	Copy of topsoil protection actions	PMU	Supervision Consultant
1.5. Disturbance to and Archaeological Cultural Sites	There are no cultural or archaeological sites found in the Mirwah to Naukot road and thus no mitigation measures are required.	----	---	----	----	----
1.6. Materials Haul Routes	Construction vehicles hauling materials along urban roads and anywhere where there are roadside residence will be limited and the WSD will establish a route plan to minimize this disruption.	Route plan confirmed by PMU-planners and recorded for use in audit report	Prior to contractor mobilization	Written and dated note indicating compliance & inspection	PMU	Supervision Consultant
1.7. Consultation Plan with affected roadside landowners	The work along this road will affect the access from a business and residence to the road . WSD will define a road work information exchange procedure requiring the contractor to inform roadside landowners of the work, the period of access restriction and the	Review of plan and confirm a) consultation action proposed b) inclusion of timetable and c) inclusion of clean	Completed prior to contractor mobilization and provided the contractor as part of the contract	Written and dated note indicating compliance	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	measures taken to allow movement around the construction work, as well as actions to be taken to re-establish the preconstruction access	up and reconnection action.	documentation			
1.8. Contractor's Environmental Safeguards Capacity	Contractors frequently do not comply with workplace and environmental safety regulations. To address this WSD will require the contractor to define an Occupational and Environmental Health and Safety procedure for all work, including work camp operation, management of cement dust, mandatory use of Personal Safety Equipment	Review Construction contracts and specifications- to check content for OHS plan content.	Plan to be provided the Consulting Engineer and PMU prior to start of work	Written and dated note indicating compliance	PMU	Supervision Consultant
2. Construction Period Impacts						
2.1 Dust Generation : Transport of Materials						
i. A small increase in TPM (dust) is expected within the ambient air of the construction area and from vehicles hauling construction materials to the work sites.	<p>i. The Contractor will be required spray water on unsealed roads and work areas daily, within villages and past houses located close to the road and giving priority to sealing in urban areas.</p> <p>ii. Dust control at the construction site will be controlled by watering, setting strict speed limits of no more than 30kph in or near settled areas.</p>	Travel work areas and check for dust—and if found take immediate action with contractor	Anywhere where there is material moved, earthworks cutting and filling.	Written and dated note indicating compliance or issue and action taken	PMU	Supervision Consultant
2.2 Dust Generation: Quarry and Batchling Plant Operation	i. Dust from the cement work will be avoided by using bulk cement brought to the plants in large tanker trucks and transferred to the plant hoppers via a closed system.	Travel Quarry and Batchling Plant Operation site and check for dust—and if found take immediate	Anywhere where Quarry and Batchling Plant is being operated.	Written and dated note indicating compliance or issue and	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	i. Batch plants will need to be equipped with dust suppression equipment, now standard on most such facilities, or which can be easily retrofitted	action with contractor. Inspect batching plant dust suppression mechanism, its maintenance log book.		action taken		
2.3 Top Soil Erosion	<ul style="list-style-type: none"> i. Excavation of earth fill will be limited to an appropriate depth of 20cm. ii. Where use of agricultural land is unavoidable, the top 15cm of topsoil will be stripped and stored and then replaced after removal of borrow material. iii. Where deep ditching is carried out, the top half metre layer will be stripped and stockpiled. iv. The ditch will be filled initially with debris/scrap material from old construction and levelled with stockpiled topsoil later. v. Where ditches and borrow pits cannot be fully rehabilitated, land owners will be compensated as provided in agreements between the land owner and contractor 	<ul style="list-style-type: none"> i. Check query sites for depth. ii. Ensure contractor store topsoil properly, and restore query site as much as possible at end of work. iii. Ensure Land owner get adequate compensation 	At any locations where borrow pits, quarries will be operated.	. Written and dated note indicating compliance or issue and action taken	WSD	Supervision Consultant
2.4 Increase in air pollution from vehicular and machinery exhaust	Emissions will be kept to a minimum by: <ul style="list-style-type: none"> i. ensuring that the contractor's fleet of vehicles are properly 	Record findings and conduct regular inspections in association with	Throughout the construction period	Inspection note to file for use in contractor reporting and	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<ul style="list-style-type: none"> ii. maintained according to manufacturer's specifications; ii. use appropriate octane fuel and haul loads within specified limits. ii. Vehicle idling time limits to no more than 2 minutes and v. Equipment maintenance specifications will be imposed through construction inspection and regular reporting. v. Equipment such as the diesel generator will be included in the emission control program and will be and regularly tuned to prevent excessive TPM pollution. 	construction supervision		in semi-annual audit report		
2.5 Disposal of Spoil and Solid Waste						
i. Asphalt layers and base materials of the existing road	i. It may be re-used in the soft shoulders or as fill for other parts of the new road depending on the quality of the material. It may also be used as back-fill for borrow pits and then over-lain with top soil. Asphalt can be pulverized, spread on access roads and compacted.	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant
ii. Disposal of waste sand, aggregate, empty drums, concrete waste and waste from work camps.	<ul style="list-style-type: none"> i. The contractor will identify dumping locations for construction debris and non hazardous solid waste with TMA Mirpurkhas, and EPA Mirpurkhas. i. The contractor shall identify any hazardous waste as part of its health and safety plan and dispose of the material through Sindh EPA approved waste contractor s under 	Monitor to check waste handling and disposal procedure of contractor	Throughout construction period	Note to file, signed and dated	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>section 13 of the Sindh Environment Protection Act 2014.</p> <p>iii. The cost of disposal of hazardous waste and non-hazardous waste shall be included in the Contractors BOQ item.</p>					
2.6 Noise & Vibration						
i. Noise and Vibrations associated with earthworks and haul roads.	<p>i. Enforcing a speed limit of 30 kph within 500m of any village and the use of water sprinkling for dust settling at least on road for 500m on either side of a village, Same approach is to be taken if the other site is used.</p> <p>ii. Restricting operating hours through roadside villages and settlements to between hours of 0700 and 1800.</p> <p>iii. Large and noisy machinery operations close to urban areas are restricted to daylight hours, and a schedule agreed to between the contractor and the local communities.</p>	Using a portable noise meter, monitor checks conditions , and inspects if work conducted within permitted time period on urban zones	Throughout construction period	Inspection note, signed and dated	PMU	Supervision Consultant
ii. Excessive Noise at sensitive sites, identified in IEE, i.e. schools, residential areas, mosques, health care centers	ii. At the same locations and times that surface water quality is tested, noise measurements will be completed, but with measurements taken at sensitive receptors As defined in the IEE	Noise measurements at these sites recorded by monitor and if exceeding, immediate action to erect temporary barriers	Throughout the construction period	Inspection note with noise reading results	PMU	Supervision Consultant
2.7 Quarry/Borrow Materials						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
i. Overloading of trucks, damaging pavement, bridges, culverts etc	i. The Contractor will need to ensure that loaded trucks do not exceed road, bridge and pavement specifications and are checked by weighbridges. The contractor will be required to monitor the transport of material, recording vehicle movements and weights, to be inspected.	Examine weighbridge records and compare to amount of material moved	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
ii. Risk of erosion and destruction of landscape / agriculture land from side borrow operations.	ii. Side borrow action is discouraged. However, any need for such work will be subject to local environmental approvals and procedures and should also be carried out in consultation with ES of IA/PMU.	Inspect all side borrow activities and establish what permission given, and if none require immediate closure and restoration of the site.	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
iii. contractor extracts material from borrow areas without the permission of the Landowner.	iii. It will be ensured by PMU that borrow material will be purchased/ or taken only after the consent of the land owner has been obtained.	Inspect all borrow areas outside RoW and establish permit/ agreement to take materials	Throughout construction period.	Inspection note re findings, dated and signed		
2.8 Contamination of Water Resources (Surface& Ground)						
i. Surface water can be polluted by entering cement and other chemicals used in rehabilitation works	i. All fuel storage sites must be checked daily for leaks and held in an impervious site where spilled/leaking material can be collected. ii. Fuel and oil storage areas should be at least 500m away from watercourses and repair and	Regular inspection of work camps, contractors yard, fueling areas , fuel storage	At least monthly throughout the construction period	Checklist showing check fuel and lubricant handling, waste oil management , machinery	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>fuelling yards to be equipped with an impervious platform, with interceptor traps so that any fuel leakage is retained within the site.</p> <p>iii. Wash down water from machinery repair areas to be directed into this system that retains the oil and grease. Refuelling to be carried out at the fuel storage area and not be permitted within or adjacent to watercourses. Surface water channels crossed by the road will be monitored upstream and downstream of the crossing once before, during and after the work has been completed on that crossing.</p> <p>iv. All diversions must be checked for Signages and lightings on weekly basis,</p>	Regular monitoring of diversion for signages and lightings	At least fortnightly where diversions are placed	<p>was down water control, etc. signed and dated--filed.</p> <p>Checklist showing the check for lighting and signages signed and date filled</p>		
2.9 Damage / disturbance to Utilities within RoW	<p>i. A relocation plan of the utilities will be developed during the preparation of the LARP. The Contractor will need to be aware of the location of these services so that disruptions are not caused.</p> <p>ii. Placing the responsibility for any repair of the services with the Contractor will assist in avoiding damage to these services.</p>	Review of notifications and approvals from all utilities as per the legal requirements	<p>Before the start of construction work.</p> <p>Design phase.</p>	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.10 Traffic Disturbance						
i. Loss of access for roadside residents	Contractor shall provide safe and convenient passage for vehicles and pedestrians to and from side roads and	Inspect construction areas where	Throughout construction period	Inspection note re findings,	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	properties connecting the project road/area, Work that affects the use of side roads and existing access shall not be undertaken without provision of adequate alternate routes; to the prior satisfaction of the Engineer and affected persons. Contractor shall submit the Traffic plan which needs to be approved from The Engineer.	access is an issue and establish if contractor is managing problem and if local residents are satisfied.		dated and signed		
2.11 Health and Safety Concerns						
<p>i. Protecting the workforce and maintaining a safe working environment.</p> <p>ii. Transmission of communicable diseases (such as STI's and HIV/AIDS) to the local community.</p>	<p>i. Contractor must provide safety vests, hard hats and protective footwear, dust masks (good for 2.5 micron size particles) and ear plugs for all workers handling heavy machinery, and working with hazardous materials such as concrete, asphalt, paints, cleaning agents, herbicides and pesticides.</p> <p>ii. Contractor to provide high-visibility clothing for workers at sites that have active traffic. Any works at night should be adequately lit and high visibility clothing worn. Contractor to provide basic training on use of protective clothing and equipment.</p> <p>iii. All Construction labour and staff of the contractor and consultant will briefed in STD's and given option to be tested (personal choice).</p>	Inspection of construction sites to ensure proper use of OHS gear and contractor enforcement	Throughout construction period	Inspection note re findings, dated and signed	PMU	Supervision Consultant
2.12 Intruption /Contamination of Water Sources						

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<ul style="list-style-type: none"> i. Contractor should provide the adequate sized diversion, so that there shall be no disturbance to water flows of canal /water course. ii. Protection mechanism should be provided to avoid contamination. iii. Contractor should prepare traffic management plan, duly approved by the Engineer. Contractor shall also provide appropriate diversions, with signages and lighting arrangements, to avoid any accidents. iv. The land used for the temporary diversion and the water course shall be restored as far as possible to its initial state once the work has been completed 	<p>Inspection of diversion along the road, check signages, lighting any leakage etc at the diversion and rectify through contractor.</p> <p>Ensure contractor has adequately restored temporary land.</p>	Culverts and bridges	Contractor EHS Officer	IA /PMU	Supervision Consultant
2.13 Over Used Local Resources						
i. Project Labor force can impose a burden on, water resource, wildlife, fuel wood, and sanitation system.	i. Local labour will be hired for the project so there will be no additional impact on natural and social resources and services.	Inspection of work areas and meet with local officials to establish if excessive use of local resources is a concern	Throughout construction period—at least once when work is near or in a community	Meeting note signed and dated	PMU	Supervision Consultant
2.14 Contractor Good Housekeeping Practices not Applied	<ul style="list-style-type: none"> i. All camps shall be provided with septic sanitation facilities and potable water. ii. A solid waste collection program must be established iii. Monitoring will be required for the solid waste disposal at camp site 	Inspect all camp operations including worker housing and all waste management procedures	Throughout the construction period while work camps are in operation	Inspection note re findings, dated and signed	PMU	Supervision Consultant

Environmental Issue	Mitigative Measure	Monitoring Action	Timing	Monitoring Delivered By	Implemented by	Supervised by
	<p>and to ensure that the health and safety plan based on contract specifications is followed.</p> <p>iv. Once the site is no longer needed the contractor must fully decommission it, with special emphasis on waste removal and clean up of any spills or hazardous materials plus any necessary re-vegetation.</p>					
3. Operating Period						
3.1 Missing environmental safeguards completion report	The contractor, will provide an mitigation and monitoring completion report listing all actions taken in compliance with this EMP items defined and with any other safeguard requirement specified in the contract document and submit that to the PMU before the final payment can be released	Obtain completion report and review for compliance	1 month before the end of the construction period	Note to file and copy of completion report	WSD	WSD
3.2 Air Quality degraded and Noise Level Increase	Maintenance Dept. will endeavour to keep road dust free and speed limit signs will be maintained. Police will improve enforcement of limits and conduct spot checks if muffler systems on trucks. Also signed re no-horn use will be erected in urban areas.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	WSD	WSD
3.3 Increased Risk of Accident and Injury	Traffic speed limit and noise restriction signage will be installed along the road and monitored by the traffic police An emergency service may be provided by the local authorities. Traffic calming in urban areas including speed-bumps.	WSD to take necessary action	During the operation of the upgraded road—on a continuing basis	Note to file indicating status of this maintenance work	Traffic Police and WSD	WSD

