

# Draft Program Safeguard Systems Assessment

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September 2016

## PAK: Access to Clean Energy Investment Program

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## **PROGRAM SAFEGUARD SYSTEMS ASSESSMENT**

1. This document presents the Program Safeguard Systems Assessment (PSSA) of the Clean Energy Investment Program. The PSSA examines the environmental and social safeguard management and compliance aspects of the Clean Energy Program to ascertain the agreement with the policies principles in the Safeguard Policy Statement (SPS), 2009 of the ADB. The PSSA includes a safeguard gap analysis for the program and recommends program action plan. As results-based lending (RBL) based financing categorically excludes any Category A project, a screening mechanism for ensuring that no Category A project is submitted for financing is also provided.

2. Detailed assessment is in the Supplementary Document on Environment Safeguard System Assessment. This document contains details of the proposed program, typical design of MHP and solar PV, complete environmental and social risk assessment, detailed discussion of safeguard policy principle triggered, record of consultations undertaken, report of site visit to the MHP sites, terms of reference for environmental and social staff of Pakhtunkhwa Energy Development Organization (PEDO), and sample checklist for screening and assessment.

3. The program mainly comprises financing of micro-hydropower plants (MHPs), solar power units in rural schools and primary health care facilities (PHFs) and promoting energy efficiency. Irrespective of the size, the MHPs work on the same principles and have similar components—diversion structure, siltation basin, water channel, forebay tank, penstock, powerhouse and tailrace.

4. Solar photovoltaic (PV) system is a clean, sustainable and financially viable method to increase the access of energy in the rural areas. Each PHF will be provided with 12 PV modules, four fans, ten LED lights and a 250-watt nebulizer. The system includes a 6 KWh gel type OPZv tubular batteries along with a remote monitoring system and electric and structural accessories. Similar package will provided to schools for fans and LED lights.

5. Project scope includes (i) installation of micro-hydropower plant in rural off-grid areas of KPK; (ii) installation of solar plants for 23,000 schools and 2,587 PHFs in the two provinces (KPK and Punjab); (iii) installation of solar plants at a university in Bahawalpur; and (iv) zero-net energy building and conducting energy audits for public sector buildings.

### **A. Program Environmental and Social Impacts and Risks**

#### **A.1 Environment and Social Risks of KP Program**

##### ***Environment Risks***

6. **Micro-hydropower program.** The potential environmental risks of individual MHPs include: restrictions on access to water for users located in the low-flow section of the stream, pollution from construction activities, impact on ecology particularly when multiple MHPs are located on the same stream, slope stabilization issues, vegetation removal, encroachment into protected areas, community safety and health and safety issues during construction and operation.

7. **Solar power program.** There is no significant environmental risk associated with solar program. The potentially minor environmental risks of solar PV include social issues related to privacy during the installation and maintenance activities on rooftops, pollution from disposal of spent batteries, removal of trees, and health and safety issues. This risk is mitigated by measures to ensure transparency of the process.

#### ***Involuntary Resettlement***

8. **Micro-hydropower program.** Land is required for water channel, water tank, penstock, power house and transmission line. Total land required for one MHP is normally less than 500 square meter. The land is provided by the local communities as counterpart support including other assets such as trees and labor, therefore involuntary resettlement is not involved. However, there is a risk that land owner may be forced to donate land.

9. **Solar power program.** There is no involuntary resettlement involved in this component of program as all the solar plants will be installed on school and PHF roofs, and no private land is required for this purpose.

#### ***Indigenous Peoples***

10. As all districts of KP are targeted, some projects may be located in Chitral District where the Kalash people live in three isolated mountain valleys, Bumburet, Rukmu, and Birir. These valleys are opening towards the Kunar River, some 20 km south (downstream) of Chitral. Kalash people speak the Kalasha language, from the Dardic family of the Indo-Aryan branch. The Kalasha or Kalash, are considered indigenous people as they have unique language, customs, festivals, rituals, religion and they are confined to their area. They are also considered to be Pakistan's smallest religious community. Construction of MHP or the solar program is not likely to have any negative social impacts on the Kalash people. However, if indigenous people are involved in the projects ADB policy principles regarding indigenous people will be followed during planning and implementation of the projects.

### **A.2 Environment and Social Risks of Punjab Program**

#### ***Environmental Risk***

11. **Solar power program.** There is no significant environmental risk associated with solar program. The potentially minor environmental risks of MHPs include social issues related to privacy during the installation and maintenance activities on rooftops, pollution from disposal of spent batteries, removal of trees, and health and safety issues.

#### ***Involuntary Resettlement***

12. Under the Energy Efficiency program, EDoP is constructing a zero energy building in Johar Town Lahore in Punjab area. The required land belongs to Lahore Development Authority (government land) and EDoP is in a process of purchasing land from LDA. There are six tents that were set up temporarily by squatters within the site. There is land available along the same area where they can move without impacting on their livelihood or assets. They agreed to move their tents to the adjustment vacant lot, but requested public faucet be provided in the area and the adjacent land be leveled to avoid flooding during the rainy seasons.

***Indigenous People***

13. No indigenous people will be affected by the Punjab Program.

**B. Safeguard Policy Principles Triggered**

14. Safeguard principles applicable to the Access to Clean Energy Investment program are as shown in Table 1.

**Table 1: Safeguard Policy Principles Triggered**

<b>Principles (Summarized)</b>	<b>KPK</b>	<b>Punjab</b>
<b>Environment</b>		
Principle 1. Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.	It is essential to screen every project submitted for financing to ensure that no Category A project is financed. Screening is also required to determine whether an IEE is required under the national regulations. The screening shall be made part of the Feasibility Study.	It is essential to screen every project submitted for financing to ensure that no Category A project is financed. Screening is also required to determine whether an IEE is required under the national regulations. The screening shall be made part of the Feasibility Study.
Principle 2. Conduct an environmental assessment for each proposed project.	Based on the screening tool, IEE shall be carried for all projects falling in category B.	Based on the screening tool, initial environmental examination will be carried for all activities falling in category B.
Principle 3. Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.	All FS of the MHPs will identify any alternatives that were considered. For Category B projects, the IEE will examine the technical, environmental and other aspects of the alternatives, including the no project alternative.	Not triggered
Principle 4. Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an environmental management plan (EMP). Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.	As required by the SPS and the national regulations, an EMP will be prepared for all Category B projects. For projects that are exempt from EIA and IEE an environmental checklist approach will be undertaken that will include the list of environmental mitigation and monitoring measures that will be undertaken for the MHPs and Solar PV projects.	Not triggered Assessment will be performed if required under national regulations commensurate to the size of the project. At present these are not required under national regulations.
Principle 5. Carry out meaningful consultation with affected people. Ensure women's participation. Involve stakeholders early in the project preparation process. Continue consultations with stakeholders throughout project implementation. Establish a grievance redress mechanism.	Consultation will be required for all projects. The level of consultation will be commensurate the magnitude of the project. Grievance redress mechanism needs to be established.	Consultation will be required for all Category B projects and all non-Category B MHP.
Principle 6. Disclose a draft environmental assessment (including the EMP) in a timely manner.	All environmental assessments, IEE and Environmental Checklists, will be posted on the website of the PEDO.	Not triggered Screening will be disclosed and assessment will be performed if required under national regulations commensurate to the size of the

Principles (Summarized)	KPK	Punjab
		project. At present these are not required under national regulations.
Principle 7. Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions, and disclose monitoring reports.	Based on the IEE and Checklist of Non-Category B projects, appropriate monitoring will be undertaken of the activities and their environmental impacts. Monitoring reports will be produced and posted on the PEDO website.	Not triggered Environmental assessment with EMP will be performed if required under national regulations commensurate to the size of the project. At present these are not required under national regulations.
Principle 8. Do not implement project activities in areas of critical habitat, unless (i) there are no measurable adverse impacts, (ii) there is no reduction in the population of any recognized endangered or critically endangered species, and (iii) any lesser impacts are mitigated.	In the screening procedure, an assessment will be carried out on whether the project or any of its component is located in a protected area. Any project located in a National Park or a Wildlife Sanctuary will be excluded. Any project located in a game reserve or Protected Forest will be categorized as Category B and an IEE will be undertaken.	Not triggered
Principle 9. Apply pollution prevention and control technologies and practices consistent with international good practices.	Appropriate steps will be proposed in the EMP of the Category B project.	Not triggered Recycling of batteries is incorporated into the design of the project. The TA component will include for capacity building in this area.
Principle 10. Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease.	Health and Safety Measures will be included in the EMP of Category B projects.	Health and Safety Measures will be included in the FS.
Principle 11. Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessment.	The projects are unlikely to affect any cultural resources. The Screening Procedure will include provisions to exclude any project that require will affect any cultural heritage.	Not triggered
<b>Involuntary Resettlement</b>		
<b>Principle 1:</b> Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of DPs, including a gender analysis, specifically related to resettlement impacts and risks.	Early screening of all projects is required and will be conducted in order to determine the requirements, if any, for involuntary resettlement (IR). Any project requiring any IR at all (i.e. all Category A and/or B projects) which cannot be redesigned to completely avoid IR, shall not be financed.	Early screening of all projects is required and will be conducted in order to determine the requirements, if any, for involuntary resettlement (IR). Any project requiring any IR at all (i.e. all Category A and/or B projects) which cannot be redesigned to completely avoid IR, shall not be financed.
<b>Principle 2:</b> Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment	Meaningful consultation is always required and will be conducted during project	Meaningful consultation is always required and will be conducted during project

Principles (Summarized)	KPK	Punjab
organizations.	<p>identification,</p> <p>Consultations will inform communities of the project processes and community responsibilities, including any requirements for voluntary contribution of land by the community, and labor and other community assistance required during project implementation.</p> <p>Opinions of the community will be sought during consultations and any concerns expressed will be addressed, either during the initial or subsequent consultations. Every reasonable effort will be made to modify project designs to address suggestions and concerns expressed by the community.</p>	<p>identification,</p> <p>Consultations will inform communities of the project processes and community responsibilities, including any requirements for voluntary contribution of land by the community, and labor and other community assistance required during project implementation.</p> <p>Opinions of the community will be sought during consultations and any concerns expressed will be addressed, either during the initial or subsequent consultations. Every reasonable effort will be made to modify project designs to address suggestions and concerns expressed by the community.</p>
<p><b>Principle 6:</b> Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.</p>	<p>Projects will only be considered for financing where any land required for MHP infrastructure is voluntarily donated by the community. Transparency of the donated (voluntary) land acquisition process will be ensured through detailed consultation records, written agreements, grievance records, project reports, and reports of independent monitor.</p>	<p>Projects will only be considered for financing where any land required is voluntarily donated by the community. Transparency of the donated (voluntary) land acquisition process will be ensured through detailed consultation records, written agreements, grievance records, project reports, and reports of independent monitor.</p>
<p><b>Principle 12:</b> Monitor and assess resettlement outcomes.</p>	<p>A monitoring system will be established to monitor all the activities during design, construction and operation phase of the projects.</p>	<p>A monitoring system will be established to monitor all the activities during design, construction and operation phase of the projects.</p>
<b>Indigenous Peoples</b>		
<p><b>Principle 1:</b> Screen early on to determine (i) whether Indigenous Peoples are present in, or have collective attachment to, the project area; and (ii) whether project impacts on Indigenous Peoples are likely.</p>	<p>All the projects will be screened to determine whether any indigenous people or communities are being affected by the project or not.</p>	<p>Not triggered</p>
<p><b>Principle 2:</b> Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples</p>	<p>Social impact assessment will be conducted to identify project impacts on indigenous people. Concerns of indigenous people, their priorities and preferences regarding project design, implementation, operation and its outcomes will be identified and mitigation</p>	<p>Not triggered</p>



Principles (Summarized)	KPK	Punjab
	measures designed as required.	
<p><b>Principle 3:</b> Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation.</p>	<p>Meaningful consultation is always required and will be conducted during project identification,</p> <p>Consultations will inform communities of the project processes and community responsibilities, including any requirements for voluntary contribution of land by the community, and labor and other community assistance required during project implementation.</p> <p>Opinions of the community will be sought during consultations and any concerns expressed will be addressed, either during the initial or subsequent consultations. Every reasonable effort will be made to modify project designs to address suggestions and concerns expressed by the community.</p>	Not triggered
<p><b>Principle 4:</b> Ascertain the consent of affected Indigenous Peoples communities.</p>	<p>The projects will be designed with the full consent and donation of the land by the IPs, who will also be involved in designing the projects.</p>	Not triggered
<p><b>Principle 5:</b> Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources.</p>	<p>The projects will not result in any physical displacement from protected areas and natural resources. Any restricted access will only be considered with full consent of the affected IPs.</p>	Not triggered
<p><b>Principle 6:</b> Prepare an Indigenous Peoples plan (IPP) that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected Indigenous Peoples communities. The IPP includes a framework for continued consultation with the affected Indigenous Peoples communities during project implementation; specifies measures to ensure that Indigenous Peoples receive culturally appropriate benefits; identifies measures to avoid, minimize, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures, monitoring and evaluation arrangements, and a budget and time-bound actions for</p>	<p>An IPP, including a framework for continued consultation, will be prepared as required to ensure culturally appropriate interventions.</p>	Not triggered

Principles (Summarized)	KPK	Punjab
implementing the planned measures.		
<p><b>Principle 7:</b> Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected Indigenous Peoples communities and other stakeholders.</p>	Draft and Final IPP will be disclosed as required.	Not triggered
<p><b>Principle 9.</b> Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective and desired outcome have been achieved.</p>	A monitoring system will be established to monitor all the activities during design, Construction and operation phase of the projects.	Not triggered

## C. Diagnostic Assessment

### C.1 Assessment Methodology and Resources

15. The activities undertaken to assess and validate existing safeguards systems for environment and land acquisition and resettlement (LAR) and determine potential involuntary resettlement impacts and institutional capacity for safeguards implementation, the following activities were carried out i) document reviews of existing relevant laws, policies, feasibility studies and other report; ii) site visit to completed, under construction and proposed project sites; iii) consultations with communities in Miandam Valley and at building site in Punjab, a similar consultation was undertaken in Punjab; iv) Meetings and interviews with EAs (PEDO and EDoP) and NGOs (SRSP and AKRSP). The existing practice of land contribution was assessed. The existing institutional setup of PEDO and EDoP was also assessed.

### C.2 KP Program

#### *Environment*

16. The current environmental law of KP, the Khyber Pakhtunkhwa Environmental Protection Act 2014 and its subservient rules and regulations, requires that a detailed environmental impact assessment (EIA) shall be undertaken for hydropower projects for 50 megawatt (MW) or more and an initial environmental examination (IEE) shall be undertaken for projects of less than 50 MW. This categorization is provided by the IEE-EIA Regulations 2000.<sup>1</sup> If the project is very small with insignificant or minimal impact, the IEE requirement is not enforced. However, KPEPA recognizes the fact that even very small projects in large number can have some impacts on the environment. Such project fall under Regulation 5 of the IEE-EIA Regulations 2000 where KPEPA issues guidelines for the category of the project and require the proponents to submit a brief checklist-based assessment and an undertaking that the proponent will comply with the guidelines. More than 20 guidelines have been issued.<sup>2</sup> MHP is a typical project for which KPEPA is likely to develop guidelines.

17. Until KPEPA develops the guidelines, PEDO requires its partner organizations that are developing the MHPs to undertake a brief environmental assessment using a checklist which has been borrowed from Environmental Management Framework used by Pakistan Poverty Alleviation Fund (PPAF) to fund small infrastructure projects.<sup>3</sup> The Environmental Checklist is submitted as part of the Feasibility Study (FS). Based on the review of the checklist format, filled checklist in the FS, and discussion with PEDO staff, suggest that fundamentally this is a workable system, however, some improvement in the checklist is required. Further, the capacity building of PEDO staff is required in order to effectively identify, review or manage environmental aspects of the MHP.

<sup>1</sup> Pakistan Environmental Protection Agency Initial Environmental Examination and Environmental Impact Assessment Review Regulations 2000.

<sup>2</sup> <http://environment.gov.pk/information-services/>

<sup>3</sup> Pakistan Poverty Alleviation Fund, Islamabad. May 2000. *Environmental Management Framework Guidelines for PPAF Financed Projects, Volume II: Instruction Manual for Environmental Assessment*. Prepared by Hagler Bailly Pakistan.

18. Solar power projects do not require any form of environmental assessment under the present law. This is justified since the solar program is likely to have minimal environmental risk associated with it. The only environmental concern is the disposal of replaced batteries that will contain hazardous material such as lead. A containment and recycling program for the replaced batteries will be required.

### ***Involuntary Resettlement***

19. There is no involuntary resettlement involved in clean energy investment program. In order to ensure that no project includes IR, the following policy will be adopted for the program.

- Early screening of all projects will be undertaken to fully determine the project impacts, including the land requirements..
- Consultations with local communities will be undertaken throughout the screening, planning and implementation phases of each project. Consultations will be recorded in detail and will include all discussions in relation to the donation of land, if applicable.
- Where land donation is required, written agreements between the parties will be obtained.
- Donated lands for MHPs will be legally transferred to MHPs.
- If there is any involuntary land acquisition and resettlement identified in any project, the design will be changed to avoid involuntary land acquisition and resettlement. If this is not possible, the project will be excluded from the program. Subproject proposals with IR impacts will be excluded from the program.
- A grievance redress mechanism will be in each project, with representation of affected people, NGOs and local government. A grievance log will be established prior to project implementation and will be available for inspection and reporting by project monitors.

### ***Indigenous Peoples***

20. Since all the subprojects have yet not been identified, there is a chance that some projects may directly benefit some IP communities. For such subprojects, IPs will be engaged in a culturally appropriate manner and following local norms and decision making, and the applicable principles of ADB's SPS-2009 will be followed.

## **C.3 Punjab Program**

21. **Environment.** Solar power projects do not require any form of environmental assessment under the present law, however, EIAs and IEEs have been conducted for large projects in Punjab that require acquisition of land. The solar program is likely to have minimal environmental risk associated with it. The only environmental concern is the disposal of replaced batteries that will contain hazardous material such as lead. A containment and recycling program for the replaced batteries will be required.

22. **Involuntary Resettlement.** The Solar program does not involve land acquisition. However, as described earlier the part of the land on EDoP is constructing a zero energy building under the Energy Efficiency Component. The site is temporarily used by six informal users who will move their tents on the remaining open space. Their movement is not expected to impact on their livelihood and assets.

#### D. Safeguard Program Actions

23. The approach proposed to ensure compliance with the SPS is outlined in Table 2. And briefly discussed below.

24. **Environmental screening and management tool.** A tool will be develop that will applied to individual MHPs to ensure that:

- No Category A sub-project will be considered for ADB financing; and
- Any project that falls into Category B, is identified early during the process and appropriate environmental assessment is undertaken.

25. The tool will have the following components i) project screening (based on size and location of the project); ii) basic environmental setting; iii) key environmental and social indicators; iv) minimal consultation that will be required; v) list of mitigation measures that may be incorporated in the project design; and vi) environmental monitoring that will be undertaken.

26. As discussed earlier, the current legal requirements for MHP are unclear. To remove the ambiguity, PEDO will work with KPEPA to include MHP in the list of projects which can be undertaken by submitting a checklist and an undertaking to comply with the required mitigation measures. To meet the regulatory requirement, the Environmental Screening and Management Tool will be attached with an undertaking that will declare the willingness of the project proponent to comply with the mitigation measures in the tool. The undertaking and the checklist will be submitted to the KPEPA.

27. **Institutional capacity building.** PEDO will develop in-house capacity to manage the environmental and social aspects of the projects by appointing an Environmental and Social Experts and other staff in the project implementation organization.

28. A Social and Environment Cell will be established at PEDO. Social and Environment Cell will comprise of social and environment experts responsible for the social and environmental aspects of the project. Social and Environment cell will also have Social Mobilizers at project level (PEDO may involve concerned NGO's Social Mobilizers). Moreover in every district a grievance redress cell will be established comprising of one representative from PEDO, one from district management and one from concerned NGO under Social and environment Cell of PEDO. This grievance redress committee will be responsible to redress all the complaints received during the design, construction and implementation of the projects.

29. **Resettlement and community participation.** There will be no involuntary resettlement involved in the project, and confirmation of this is will be provided for each project. The following steps will be undertaken: i) A detailed investigation/ survey to assess the actual project impacts; ii) meaningful consultations will be undertaken with the local communities and the consultations will fully address the land requirements of the project; and iii) if there is any indication of involuntarily resettlement, design of the project will be changed to avoid it or the project will be excluded from financing under the program.

30. **Involuntary resettlement in energy efficiency program.** Land will be transferred to the EDoP before start of the project. More consultation will be undertaken with squatters and their requests, including provision of drinking water and land leveling will be included in the project. As soon as land is transferred to EDoP the site will be marked and fenced to prevent encroachment.

31. **Indigenous people.** Where there are indigenous communities involved in the project an early screening of the projects will be done to assess the project impact on indigenous people in terms of customary rights of use and access to land and natural resources; socioeconomic status; cultural and communal integrity; health, education, livelihood, and social security status; the recognition of indigenous knowledge; and the level of vulnerability of the affected Indigenous Peoples community. Moreover meaningful consultations will be undertaken with the indigenous people, communities and their organizations and project will be designed, constructed and operationalized with their consent. Sites that may have adverse impacts on IP communities will not be considered.

**Table 2: Safeguard Program Actions**

<b>Gap</b>	<b>Proposed Action</b>	<b>Indicator/Target</b>	<b>Resp.</b>	<b>Time</b>
[KPK] Screening—There is no formal requirement for screening	A screening tool to be included with the FS to ensure no Category A project is funded.	Approved FS template contains the Screening tool	PEDO	At the FS stage
[KPK] Environmental assessment—No assessment of Category C projects is carried out	The environmental assessment checklist used for MHPs will be improved and applied to all projects for which the regulatory IEE is not carried out.	Approved FS template contains the environmental assessment checklist	PEDO	At the FS stage
[KPK] Legal categorization—Categorization of MHP (IEE, Checklist and Undertaking, or exempt)	Work with KPEPA to finalize the checklist under Regulation 5 of the IEE-EIA Regulations 2000.	<ul style="list-style-type: none"> <li>Understanding with the KPEPA on the checklist.</li> <li>Approved FS template contains the environmental assessment requirement</li> </ul>	PEDO	At the FS stage
[KPK and Punjab] Monitoring—Currently there are no requirement for monitoring	Institute a monitoring regime for assessing the environmental performances of MHP and solar PV projects	Monitoring system installed	PEDO EDoP	Twice a year
[KP] Institutional Capacity—Need for capacity building in the PEDO to evaluate the social and environmental aspects	Appoint: i) an environmental manager and a social expert in PEDO; ii) two assistants managers in PMU; iii) 5 social mobilizers and 5 environmental field officers in implementation consulting team	<ul style="list-style-type: none"> <li>Appointment letters</li> <li>Requirements in the TOR of implementation consulting</li> </ul>	PEDO	Prior to program start
[KPK and Punjab] Waste battery disposal—No mechanism in place for disposal	<ul style="list-style-type: none"> <li>Identify companies that can recycle batteries ensuring protection of environment and health and safety of workers.</li> <li>If no company is identified, identify a place where the batteries can be stored safely</li> </ul>	<ul style="list-style-type: none"> <li>Companies with required qualifications identified</li> <li>Storage sites identified</li> </ul>	PEDO EDoP	Prior to program start
[KPK and Punjab] Grievance Redressal—No mechanism to redress grievances of the communities	Procedure will be developed for registering and redressal of grievances. This will include Grievance Redress Committee (GRC) for MHP and Grievance focal person for solar project.	<ul style="list-style-type: none"> <li>Procedures put in place</li> </ul>	PEDO EDoP	At FS stage
[Punjab] Compensation for non-title holders	Negotiation to take place with the squatters to restle them on the nearby land with assistance if needed.	<ul style="list-style-type: none"> <li>Results of negotiation with evidence to resettlement</li> </ul>	EDoP	At the FS stage