Initial Environmental Examination

July 2017

PAK: Multitranche Financing Facility Central Asia Regional Economic Cooperation Corridor Development Investment Program

Section 8 to 9 (Main Report)

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8. STAKEHOLDER CONSULTATIONS

8.1 General

239. This section describes the outcomes of the stakeholder consultation process as part of the IEE. This ensures that feedback from communities and other stakeholders directly or indirectly affected by the project is collected so that it may be used to adjust and improve the project's design, planning, implementation and help the implementation structure ensuring that the project is both environmentally and socially sound. The consultation process was carried out in accordance with the requirements of the National Highway Authority (NHA) on public consultation.

240. The objectives of this process were:

- To disseminate information on the project and its expected impact, long-term as well as short-term, among primary and secondary stakeholders,
- To gather information on relevant issues so that the feedback received could be used to address these issues at an early stage,
- To determine the extent of the negative impacts of different project activities and suggest appropriate mitigation measures.

8.2 Identification of Stakeholders

241. There are two types of stakeholders, i.e. Primary stakeholders and Secondary stakeholders.

Primary stakeholders

242. The primary stakeholders are the initial stakeholders, such as affected persons, general public and women residing in the project area. Accordingly, the consultations/ focus group discussions were made with all above primary stakeholders for sharing of information about the proposed project and expected impacts and understanding about the concerns by category of stakeholders.

Secondary stakeholders

243. The secondary stakeholders are the representatives of Government Departments/Agencies involved in the planning, design, implementation and operation of the project, including various government departments such as District Administration, WAPDA, Agriculture including the Horticulture wing, Irrigation, Forest, PWD, NHA and other relevant departments.

8.3 Stakeholder Consultation Process

244. The overall strategy for stakeholder's consultation is as follows

Table - 8.1: Process of stakeholder Consultation

Stakeholders	Purpose of consultations	Methodology	Stage
Primary Stakeholder	Information gathering and data collection. Information sharing about the project (disclosure) Opinion seeking (concerns and expectations) Grievance redress Involvement of PAPs	Focus Group Discussions Formal and informal Community meetings	 ◆ Base line Study ◆ Impact Assessment ◆ Inventory of Losses ◆ Price fixation Discloser
Secondary Stakeholder	Participation in the process Information gathering Authentication and validation of the processes verification of the record	One on one meetings In-depth interviews Group meetings	On need basis

- 245. Stakeholder consultation for this project was planned in two stages. The first stage was scoping, which has already taken place, consisted of meetings with individuals, groups, relevant organizations and government departments, which are in some way linked to the project and therefore considered stakeholders. The meetings were conducted to inform stakeholders about the project and how it may affect their lives/activities, and to record their concerns, whether real or perceived. Through the use of various tools the study team tried to involve the stakeholders in active decision-making. The results of this exercise are described below, where mitigation measures have been developed addressing the pertinent stakeholder concerns.
- 246. The second stage of the stakeholders' consultation was part of the separate study conducted for the preparation land acquisition and resettlement framework of the project. The results of this study and the proposed mitigation measures for potential social impacts will be documented separately and will be included in the overall framework of the proposed project.

Primary Stakeholder Consultation

247. Apart from gathering of quantitative data through household survey of the area of influence of the project and survey of project affected people and other local community to share the information about the project and record their concerns/ feedback associated with this project. In this context, APs shared their view point regarding the assessment especially price assessment, method of payment of compensation and procedure for entering their concerns/ grievances. A list of public consultations is attached as Appendix I, II and III.

Topics for Discussion

- 248. The topics discussed in the consultations were
- Land acquisition and resettlement issues.
- Employment and livelihoods of communities.
- Gender and women issues
- Contractor's camp and access
- Environmental issues

Table – 8.2:List of Primary Stakeholder's Consultations in the Project Area of Peshawar – Dara Adam Khel Site

		Names of Major	Occupations of the	
Date	Location	Participants	Major Participants	Feedback/ Concerns
25-10-2016	Qasim Khel Village, Dara Adam Khel	Yaqoob Khan	Farmer	He welcomed the project. He also believes on overall basis, this is a good project because it will help to improve basic infrastructure of area
25-10-2016	Qasim Khel Village	Atif Iqbal	Farmer	It is a good project that will create the job and business opportunities.
25-10-2016	Qasim Khel Village	Asim	Farmer	He demanded from the project proponents to conduct their project activities in environment friendly manners.
25-10-2016	Qasim Khel Village	Khasif Ghulam	Farmer	His views about the project as good for local area.
25-10-2016	Qasim Khel Village	Dowd Zaman	Driver	It is a good project that will create the job and business opportunities.
26-10-2016	Qasim Khel Village	Abdul Hameed	School Teacher	He demanded the proper compensation of the lands and also expressed his positive concerns about the project.
26-10-2016	Qasim Khel Village	Saeed	Shopkeeper	He demanded the proper compensation of the lands
26-10-2016	Qasim Khel Village	Ali Gohar Khan	Shopkeeper	He welcomed the project
26-10-2016	Qasim Khel Village	Qayoom	Shopkeeper	It is a good project that will improve the infrastructure of the area.
26-10-2016	Qasim Khel Village	Muhammad Farooq	Farmer	He appreciated the project and demanded Relocation

			Occupations of	
Date	Location	Names of Major Participants	the Major Participants	Feedback/ Concerns
				or Compensation should be as per the requirements of the affectees.
26-10-2016	Qasim Khel Village	Abdul Rasheed	Driver	It is a good project that will create the job opportunities
26-10-2016	Qasim Khel Village	Hamid Khan	Shopkeeper	It is a good project that will create the job opportunities
26-10-2016	Perwal Khel village	Awazmeer	Private Business	He demanded from the project proponents to do the proper plantation.
27-10-2016	Perwal Khel village	Mr. Hussain	Driver	He welcomed the project perceiving the development of the project area
27-10-2016	Perwal Khel village	Ahmad Ali	Farmer	He was in favor of project
27-10-2016	Perwal Khel village	Khush Nawaz	Driver	He welcomed the project
27-10-2016	Perwal Khel village	Aba Din	Shopkeeper	He demanded the proper compensation of the lands
27-10-2016	Perwal Khel village	Manzor Ali	Agriculture	He welcomed the project
27-10-2016	Jhangli Bypass	AsmGhul	Shopkeeper	He had no problem regarding this project
27-10-2016	Jhangli Bypass	Saeed	Private Business	Project is beneficial for local people.
28-10-2016	Jhangli Bypass	Aslam	Security Officer	It is a good project that will create the job and business opportunities
28-10-2016	Jhangli Bypass	Ghul Kareem	Farmer	He is in favor of the project.
28-10-2016	Jhangli Bypass	Muslim Tariq	Shopkeeper	It is a good project that will create the job and business opportunities.

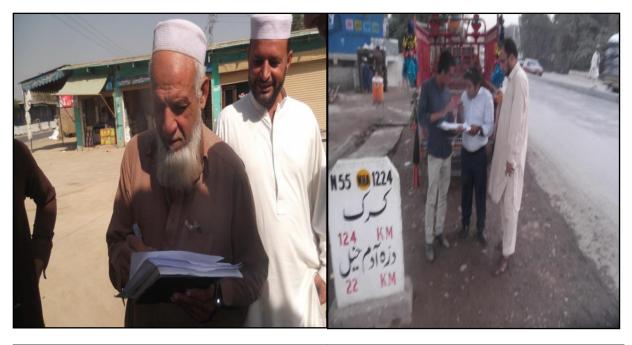
Date	Location	Names of Major Participants	Occupations of the Major Participants	Feedback/ Concerns
28-10-2016	Jhangli Bypass	Farid Khan	Student	He appreciated the project















Views of Public Consultation during Peshawar - Dara Adam Khel Site

Table – 8.3:List of Primary Stakeholder's Consultations in the Project Area of Shikarpur – RathoDero Site

		Names of Major	Occupations of the	
Date	Location	Participants	Major Participants	Feedback/ Concerns
4-11-2016	GarhiYaseen	Allah Wasaya	Farmer	He welcomed the project. He also believes on overall basis, this is a good project because it will help to improve basic infrastructure of area
4-11-2016	GarhiYaseen	Abdul Satar	Naib Qasid	He had no problem regarding this project
4-11-2016	GarhiYaseen	Luqman	Labour	It is a good project that will create the job opportunities
4-11-2016	GarhiYaseen	Zafar Ullah	Farmer	Project is beneficial for local people.
4-11-2016	GarhiYaseen	Syed Sajid Hussain	Hotel Owner	It is a good project that will create the job and business opportunities.
4-11-2016	GarhiYaseen	Ikhtayar Hussain	Shop Owner	He demanded the proper compensation of the lands and also expressed his positive concerns about the project.
5-11-2016	Dhakan Market	M. Waqar	Shopkeeper	He demanded the proper compensation of the lands
5-11-2016	Dhakan Market	Allah Waday	Shopkeeper	He welcomed the project
5-11-2016	Dhakan Market	Muneer Ahmad	Transporter	It is a good project that will improve the infrastructure of the area.
5-11-2016	Dhakan Market	Yar Muhammad	Teacher	He appreciated the project
5-11-2016	Dhakan Market	Niaz Hussain	Transporter	It is a good project that will create the job opportunities
5-11-2016	Dhakan Market	Ahtiyar	Driver	It is a good project that will create the job opportunities

Date	Location	Names of Major Participants	Occupations of the Major Participants	Feedback/ Concerns
6-11-2016	Rathodero Bypass	M. Haroon	Business Man	He demanded from the project proponents to do the proper plantation.
6-11-2016	Rathodero Bypass	Bakhat Ali	Electrician	He welcomed the project perceiving the development of the project area
6-11-2016	Rathodero Bypass	Mehram Ali	Labour	He was in favor of project
6-11-2016	Rathodero Bypass	Abdul Satar	Driver	He welcomed the project
6-11-2016	Rathodero Bypass	Naik Khan	Transporter	He is in favor of the project.
6-11-2016	Rathodero Bypass	Simad Khan	Agriculture	He welcomed the project
7-11-2016	GhalaMandi	Shoukat Abbas	Driver	He had no problem regarding this project
7-11-2016	GhalaMandi	Altaf Ahmad	Driver	It is a good project that will create the job opportunities
7-11-2016	GhalaMandi	Allah Din	Farmer	It is a good project that will create the job and business opportunities
7-11-2016	GhalaMandi	Nisar Ahmad	Driver	He is in favor of the project.
7-11-2016	GhalaMandi	Ali Ghohar	Shopkeeper	It is a good project that will create the job and business opportunities.
7-11-2016	GhalaMandi	Shamir	Hotel Owner	It is a good project that will create the job and business opportunities.















Views of Public Consultation during Shikarpur – RathoDero Site

Table – 8.4: List of Primary Stakeholder's Consultations in the Project Area of Petaro – Sehwan Sharif Site

			Occupations	
Date	Location	Names of Major Participants	of the Major Participants	Feedback/ Concerns
08-11-2016	Manzorabad	Ayaz Ali	Hotel Worker	He appreciated the project
08-11-2016	Manzorabad	Sikandar	Labour	He welcomed the project activities.
08-11-2016	Manzorabad	Raja Bali	Hotel Labor	He welcomed the project perceiving the development of the project area
08-11-2016	Manzorabad	Abdul Razaq	Farmer	He demanded the proper compensation of the lands and also expressed his positive concerns about the project.
08-11-2016	Manzorabad	Noor Hasan	Farmer	It is a good project that will create the job and business opportunities.
08-11-2016	Manzorabad	Ghulam Rasool	Farmer	His views about the project as good for local area.
08-11-2016	Manzorabad	Imran	Shopkeeper	He demanded the proper compensation of the lands
08-11-2016	Manzorabad	Riaz Ali Shah	Shopkeeper	He welcomed the project
08-11-2016	Manzorabad	Ghulam M. Sandh	Farmer	It is a good project that will improve the infrastructure of the area.
09-11-2016	Malang/ Sunkari	Ghulam Qadar	Farmer	He appreciated the project
09-11-2016	Malang/ Sunkari	Had Khan	labor	It is a good project that will create the job opportunities
09-11-2016	Malang/ Sunkari	Arshad Ali	Farmer	It is a good project that will create the job opportunities
09-11-2016	Malang/ Sunkari	Ghulam Shabir	Farmer	He demanded from the project proponents to do the proper plantation.
09-11-2016	Malang/ Sunkari	M. Bukhash	Railway Employ	Designer should avoid the sharp curves and grades.

Date	Location	Names of Major Participants	Occupations of the Major Participants	Feedback/ Concerns
10-11-2016	GhotKhasai	Ata Hussain	Farmer	He was in favor of project
10-11-2016	GhotKhasai	Abdul Alim	Driver	He demanded the proper compensation of the lands
10-11-2016	GhotKhasai	Sheer Muhammad	Driver	He welcomed the project
10-11-2016	GhotKhasai	Muhammad Athar	Driver	He welcomed the project
10-11-2016	GhotKhasai	Aqib	Farmer	He had no problem regarding this project
10-11-2016	GhotKhasai	Junaid	Hotel worker	He appreciated the project
10-11-2016	GhotKhasai	Mehtab Ali	Hotel worker	It is a good project that will create the job and business opportunities
10-11-2016	GhotKhasai	Anwar	Farmer	It is a good project that will create the job and business opportunities.
10-11-2016	GhotKhasai	Tariq	Shopkeeper	He is in favor of the project.
10-11-2016	GhotKhasai	Qurban	Driver	Project is beneficial for local people









Views of Public Consultation during Petaro – Sehwan Sharif Site

8.4 Outcome of Stakeholders Consultation

249. Generally, people were found to be aware of the need to upgrade the highway, and expressed their support for the NHA. The proposed improvement of the additional carriageway was welcomed by the people since it will reduce traffic congestion and other road hazards near settlements along the project corridor. Local communities demanded that they should be the part of a continuous consultation process with other stakeholders at different stages of the project including the design, construction, and operation periods. The concerns raised by the stakeholders/communities are described as follows:

Highway Design

- Improve general standards of construction.
- The business of the people should not be affected due to project activities.
- PAPs should be compensated according to the market rates.
- Properly compensate owners of demolished structures.
- Protection walls should be constructed where needed.
- The waste material should not be dumped in to the river.
- The road shoulders should be concreted.
- Avoid constructing sharp road curves and grades.
- Provide streams outlets to help drain away runoff from the highway into the river.
- Build bus bays, passenger shelters, and parking areas where required.
- Plant trees along the highway that could be entrusted to the care of local communities.
- Avoid shifting graves that may fall within the ROW.
- Avoid relocating/dismantling mosques and other permanent structures.
- Provide drainage on both sides of the road.

Highway Construction

- Avoid undue delays in road construction and ensure that project works are carried out in one stretch rather than piecemeal.
- Ensure that contractors do not use private land for parking construction machinery.
- Avoid dumping construction material along the highway and median.
- Adopt measures to minimize dust, smoke, and noise pollution, and to control spillages from construction machinery.
- Provide proper diversions for traffic during construction to avoid traffic congestion, related hazards, and dust emissions.

- Carry out construction activities preferably at night to avoid traffic jams / hazards.
- Proper traffic management plan should be provided during construction activities.
- Job opportunities should be provided to the locals during construction activities.
- Safety of local residents along the road should be ensured particularly due to land sliding and stones rolling.

Highway Operation

- Provide medical aid centers along the highway to treat road accident emergencies.
- Erect cautionary and information signs.
- Control over–speeding, overloading, traffic disorders and violations of traffic regulations; construct speed breakers where required.
- Prohibit commercial vendors and squatters from encroaching on the ROW.
- Increase tree plantation along the highway.
- Ensure that cross-drainage pipes and culverts are regularly cleaned.
- Regularly remove accumulated piles of rubbish from the ROW.

8.5 Redress of Stakeholders' Concerns

250. Most of the concerns raised by stakeholders have been incorporated into the project's environmental and social assessment as described below:

Table - 8.5: Redress of Stakeholders' Concerns

SUGGESTIONS / CONCERNS OF STAKEHOLDERS	PREVENTION METHODS
HIGHWAY DESIGN	In response to stakeholders' concerns, the design at locations of social disruption may be revised by the Design Consultants and if avoidable; no residential and commercial entity will be affected by the Project. In addition.
HIGHWAY SAFETY	Highway safety audits and improved road markings/signage and demarcation of accident–prone junctions will be made in order to improve the horizontal and vertical geometry, and reduce conflicting movement during operation, particularly along inhabited stretches of road. Improved intersections on side roads and village tracks will be provided in order to eliminate bottlenecks

SUGGESTIONS / CONCERNS OF STAKEHOLDERS	PREVENTION METHODS
	Roadside furniture and traffic control devices, including information and cautionary signs, signals, traffic diversion and flow markings, to ensure pedestrian safety during construction and operation.
	A drain will be designed to cater for the road drainage
HIGHWAY CONSTRUCTION	Construction vehicles will remain confined within their designated areas of movement.
	Sensitivity towards local customs and traditions will be encouraged to minimize social friction; good relations with local communities will be promoted by encouraging contractors to provide opportunities for skilled and unskilled employment to locals, as well as on—the—job training in construction for young people
	Land sliding will be minimized by constructing retaining walls
	The loss of privately owned land or built-up property will be compensated on a replacement-cost basis
	Solid waste generated during construction and at campsites will be properly treated and safely disposed of only in demarcated waste disposal sites approved by the supervision consultant
	Contractors will be required to instruct and train their workforce in the storage and handling of materials and chemicals that can potentially cause soil contamination.
	All necessary measures will be taken to ensure the safety of traffic during construction, including barricades (including signs, pavement markings, flags, and lights) erected as required by the NHA. All such barricades will be set up as per local regulations.
HIGHWAY OPERATION	High way operation plan has been provided in the IEE Report for proper operation and maintenance of road and to ensure quick rescue operations during land sliding.

251. The stakeholders supported the National Highway Authority (N-55) project provided that environmental and social issues are addressed through mitigation measures. To address the issues an IEE are developed and shared with stakeholders for their feedback and suggestions.

8.5 Grievance Redress Mechanism

252. In order to receive and facilitate the resolution of affected peoples' (AP) concerns, complaints and grievances about the Project's environmental performance, a Grievance Redress Mechanism (GRM) will be established at the Project. The GRM will address the APs' concerns and complaints proactively and promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the APs at no costs and without retribution. The mechanism will not impede access to the country's judicial or administrative remedies.

Grievance Redress Committee, Focal Points, Complaints Reporting, Recording and Monitoring

- 253. NHA will facilitate the establishment of the Grievance Redress Committee (GRC) at the location of each of the subprojects in Sindh and KP prior to the Contractor's mobilization to site. The GRC will be headed by the Project Director, and members will include Deputy/ Assistant Director Env of NHA's Environment, Afforestation, Land and Social (EALS) Unit, Asst. Director Land, the Environment Specialist of the Supervision Consultant and the contractor's Environment, Health and Safety (EHS) officer. The role of the GRC is to address the Project related grievances of the affected parties that are not resolved satisfactorily through the initial stages of the GRM.
- 254. NHA will assist the project affected communities/villages identify local representatives to act as Grievance Focal Persons (GFPs). The GFPs will be responsible for i) acting as community representatives in formal meetings between the project team and the local community he/she represents; ii) communicating the community members' grievances and concerns to the contractor during project implementation.
- 255. A pre-mobilization public consultation meeting will be convened by NHA's EALS Unit and attended by the GFPs, Supervision Consultant, contractor, community representatives and other interested parties (e.g. district level representatives, NGOs). The objectives of the meeting will be as follows:
- Introduction of key personnel of each stakeholder including roles and responsibilities;
- Presentation of project information of immediate concern to the communities by the contractor (timing and location of specific construction activities, design issues, access constraints etc.) This will include a brief summary of the EMP - its purpose and implementation arrangements;
- Establishment and clarification of the GRM to be implemented during project implementation including proactive public relations activities proposed by the project team, Supervision Consultant and contractor to ensure that communities are continually advised of project progress and associated constraints throughout project implementation period; and
- Elicit and address the immediate concerns of the community based on information provided above.

- 256. Following the pre-mobilization public consultation meeting, environmental complaints associated with the construction activity will be routinely handled through the GRM as explained below:
- Individuals will lodge their environmental complaint/grievance with their respective community's nominated GFP.
- The GFP will bring the individual's complaint to the attention of the contractor.
- The contractor will record the complaint in the onsite Environmental Complaints Register (ECR) in the presence of the GFP.
- The GFP will discuss the complaint with the contractor and have it resolved.
- If the contractor does not resolve the complaint within one week, then the GFP will bring the complaint to the attention of the Supervision Consultant's Environmental Specialist. The SC's Environment Specialist will then be responsible for coordinating with the contractor in solving the issue.
- If the complaint is not resolved within two weeks the GFP will present the complaint to the Grievance Redress Committee (GRC).
- The GRC will have to resolve the complaint within a period of two weeks and the resolved complaint will have to be communicated back to the community. The contractor will then record the complaint as resolved and closed in the Environmental Complaints Register.
- Should the complaint not be resolved through the GRC, the issue will be adjudicated through local legal processes.
- In parallel to the ECR placed with the contractor, each GFP will maintain a record of the complaints received and will follow up on their rapid resolution.
- NHA's project office will also keep track of the status of all complaints through the Monthly Environmental Monitoring Report submitted by the contractor to the SC and will ensure that they are resolved in a timely manner.

9. FINDINGS, RECOMMENDATIONS AND CONCLUSION

Findings

257. The present IEE of the proposed three road project of NHA namely Dara Adam Khel—Peshawar, Rotherdero—Shikarpur and Petaro—Shewan Project has been carried out addressing potential environmental aspects in term of both of project design and environmental definition. This is the appropriate level of assessment for the present stage of project development. The key areas of environmental sensitivity have been identified. A monitoring process has been defined to ensure that environmental sensitivities are adequately addressed at all stages of project development.

Recommendations

258. It can be concluded that the proposed: Tranche 1 of the "Central Asia Regional Economic Cooperation Corridor Development Investment Program" can be implemented safely and in an environmentally friendly manner provided that EMP will be properly implemented. So it is recommended that the project may be cleared to proceed with works.

Conclusions

- 259. The road construction works can be conducted in an environmentally sound and sustainable manner, if the identified mitigation measures and environmental management plans are adopted.
- 260. The proposed three roads will provide communication facilities for the community living near the project area- Dara Adam Khel- Peshawar, Ratendaro-Shikarpur and Petaro-Shewan etc. More over this being a part of the Central Asia Regional Economic Cooperation Corridor link so will benefit the national economy of Pakistan. Other benefits in the locality of the project area at Dara Adam Khel-Peshawar, Ratendaro-Shikarpur and Petaro-Shewan will be significant in terms of employment opportunities during the construction phase as well as operation phase thus will enhance socio-economic condition of the area people.
- 261. Notwithstanding the above, the major issue is the need to minimize disturbance to the local population in the areas of development at Ratendaro-Shikarpur Bypass area. Effort will be undertaken to promptly compensate the people affected by land acquisition at an adequate price as per Pakistan Law and Legislation.
- 262. The proposed project activities have no significant long term or residual adverse environmental impact. Short-term impacts are also insignificant and mitigation measures are well within the normal practices of construction, so no further EIA is required for this project.